

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054**

In the Matter of:]	
]	CC Docket 02-6
Request for Review by CLARE-]	
GLADWIN REGIONAL EDUCATION]	Funding Request Nos. 10008157, 1159681
SERVICE DISTRICT of Decision by the]	
Administrator of Universal Service]	Form 471 Application Nos. 369768, 420735
Administrative Company]	

REQUEST FOR REVIEW

BY

**CLARE-GLADWIN
REGIONAL EDUCATION SERVICE DISTRICT**

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October 23, 2017

INTRODUCTION

More than twelve years after approving the FY 2004-2005 request for Clare-Gladwin Regional Education Service District, USAC issued Adjustment Letters in June 2017 that sought to recover more than \$900,000 from the rural education service district. Citing only the existence of a Stock Purchase Agreement relating to a consulting firm, USAC made the initial determination that the rural education service district was responsible for unfairly influencing the outcome of the competition among service providers.

In response, Clare-Gladwin Regional Education Service District established that the consulting firm did not even exist until well after the first of the two funding years in question. Moreover, Clare-Gladwin Regional Education Service District established that its staffs' efforts with respect to the second funding year completely complied with the rules and policies of USAC and the Commission. When presented with this information, USAC did not close the matter. Instead, it ignored the information, and issued Denial Letters that proffered a completely new justification for why CGRESA was required to repay more than \$900,000 to USAC.

USAC's more recent justification fails because (i) it ignores the facts presented in CGRESA's Appeal, (ii) it raises a completely new justification without providing any supporting evidence, and (iii) it ignores well-established Commission precedent that places the responsibility for any required reimbursement on the parties that were in the best position to know about the purported violations.

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REQUEST FOR REVIEW

Pursuant to Section 54.719(b) of the Commission’s rules, Clare-Gladwin Regional Education Service District (“CGRESD”), by and through its attorney, submits this **REQUEST FOR REVIEW** of the August 23, 2017, decision by the Administrator of the Universal Service Administrative Company (“USAC”) that denied CGRESD’s appeal of the “Commitment Adjustment Letter” for Funding Year July 1, 2003 – June 30, 2004, and the “Commitment Adjustment Letter” for Funding Year July 1, 2004 – June 30, 2005 (the “Adjustment Letters”) dated June 2, 2017.¹

CGRESD timely filed its appeal of the Adjustment Letters on August 1, 2017, pursuant to Section 54.719(a) of the Commission’s rules, and USAC issued identical letters on August 23, 2017, that denied CGRESD’s appeal (the “USAC Denials”).² For the reasons set forth below, the Commission must rescind or otherwise set aside the USAC Denials, close this matter, and cease collection efforts from CGRESD.

¹ Copies of the Adjustment Letters are attached hereto as Exhibit One.

² Copies of the USAC Denials are attached hereto as Exhibit Two. This Request for Review is submitted within 60 days of the issuance of the USAC Denials. 47 C.F.R. § 54.720.

The sole basis provided by USAC for issuing the identical Adjustment Letters was that USAC had determined that there was commonality of ownership interest between Elite Fund, Inc., (“Elite Fund”) and Crystal Automation Services, Inc. (“Casair”). This determination was made by USAC because USAC had learned of a July 1, 2006, Stock Purchase Agreement between the owner of Casair, Mr. Steve Meinhardt, and Mr. Roger Hoezee, whereby Mr. Meinhardt sold his stock in Elite Fund to Mr. Hoezee. No other information or evidence of rule violations was provided in the Adjustment Letters.

CGRES D provided evidence to USAC that Elite Fund was not incorporated until September 2003, and therefore could not have had an impermissible role in the preparation and processing of CGRES D’s FY 2003–2004 funding process, which was completed at least seven months prior to the incorporation of Elite Fund.³ Moreover, CGRES D provided evidence that Elite Fund did not impermissibly participate in CGRES D’s 2004–2005 funding process, and, to the extent that USAC determined otherwise, that CGRES D should not be held responsible for the repayment of funds in light of the purported coordinated efforts of Elite Fund and Casair.

The USAC Denials do not make any mention of the original basis for issuing the Adjustment Letters, nor do the USAC Denials make any mention of the information provided by CGRES D in its Appeal. Instead, USAC proffers an entirely new justification for requiring CGRES D to refund the USAC payments that were received in 2003–2005. Rather than acknowledging that the basis for issuing the Adjustment Letters had been

³ A copy of CGRES D’s Appeal is provided as Exhibit Three.

proven incorrect and closing the matter, USAC stated in the denials that CGRES D was now to be held responsible for the repayment of the FY 2003–2004 and FY 2004–2005 payments because:

In cases where the Administrator finds “carbon copy” FCC Forms 470 across a series of applications, especially where the services and products requested are complex or substantial, and when the same service provider is involved, it is appropriate for the Administrator to subject such applications to more searching scrutiny to ensure there has been no improper service provider involvement in the competitive bidding process.⁴

Absent from the USAC Denials is any evidence that there were “‘carbon copy’ FCC Forms 470,” nor did USAC provide the identities of those applicants that purportedly submitted “carbon copy” forms with which CGRES D was to be associated.

Thus, not only did USAC fundamentally change the basis for issuing the Adjustment Letters without providing notice to CGRES D or an opportunity for comment, USAC also failed to provide any evidence in support of its new justification. Therefore, the Commission must grant this Request for Review, and issue a decision that both (i) sets aside the Adjustment Letter and (ii) closes this matter without further payment obligations imposed upon CGRES D.

BACKGROUND

Clare-Gladwin Regional Education Service District is one of 56 Intermediate School Districts, or Education Service Agencies, in Michigan. ISDs were created by the State of Michigan and organized along county boundaries to provide specialized

⁴ See Exhibit Two, pgs. 2, 4.

educational services to local school districts. Specialized services include those that are done more cost effectively when done in collaboration rather than separately. Specialized services and programs include special education, career and technical education, training for teachers and other school staff, business services, and technology services.

Created in 1962, CGRES D offers these services to five school districts⁵ in the rural counties of Clare and Gladwin.⁶ In an effort to save costs for the five local school districts, CGRES D has provided future-driven leadership in technology since the 1990s when CGRES D, the local school districts, and the local community college collaborated to install a high-speed fiber network in the two-county region. In addition to investing General Fund dollars, CGRES D sought grant funding and state and federal funding to offset technology costs.

CGRES D received USAC funding for services provided by Casair—one of the few service companies in this rural area—for Funding Years 2001–2002, 2002–2003, 2003–2004, and 2004–2005. During this period, CGRES D’s Technology Department consisted of two people, an engineer and Mr. Ken Chinavare. Mr. Chinavare (i) was listed as the contact person for both the Form 470 and Form 471, (ii) was the authorized party to sign the forms, (iii) reviewed the bids, (iv) answered questions from bidders prior

⁵ CGRES D serves Beaverton Rural Schools, Clare Public Schools, Farwell Area Schools, Gladwin Community Schools and Harrison Community Schools.

⁶ *See Appeal, Exhibit B.* According to the 2010 Census, Claire County is 70.6% rural, and Gladwin County is 88.6% rural. The respective populations of the communities were provided in the Appeal as Exhibit C and Exhibit D respectfully.

to the bid deadline, (v) evaluated the bids that were received, and (vi) made the recommendation to the CGRES D Superintendent and Board of Education.

For Funding Year 2003–2004, CGRES D filed its Form 470 application on October 7, 2002.⁷ That application included the required RFP and outlined the services to be offered to CGRES D by interested bidders.⁸ On November 15, 2002, Casair submitted its bid,⁹ and the Form 471 was filed on February 3, 2003.¹⁰ As noted above, Elite Fund, Inc., was incorporated after the Form 471 was submitted by CGRES D. In fact, Elite Fund was not incorporated until seven months later, on September 17, 2003.¹¹

For Funding Year 2004–2005, CGRES D received a bid from Casair in response to its FCC Form 470, and CGRES D was able to calculate the cost of its requirements should the services be provided by a second company, Merit Network, Inc. Merit’s prices were listed on the MiCTA website. CGRES D determined that Casair’s bid was substantially less expensive than Merit would charge—\$628,145 vs. \$889,490—and Merit would not have been able to provide the required Internet bandwidth due to transport issues, nor could it offer the necessary firewall support, proxy, cache and content services. Because Casair’s proposal was substantially less expensive, and because Casair could provide the required services, CGRES D accepted Casair’s proposal, and the Form 471 was filed.

⁷ See *Appeal*, Exhibit E.

⁸ See *Appeal*, Exhibit F.

⁹ See *Appeal*, Exhibit G.

¹⁰ See *Appeal*, Exhibit H.

¹¹ See *Appeal*, Exhibit I.

Most important for the instant matter is the fact that Elite Fund did not participate in CGRESD's review of the bid proposals. Instead, Mr. Ken Chinavare, the Technology Director for CGRESD, reviewed the bid proposals and made a recommendation to CGRESD's Board of Education. CGRESD's Board of Education agreed with Mr. Chinavare's recommendation, and Casair was selected.

DISCUSSION

The above-referenced information was provided to USAC with the reasonable expectation that USAC would review and address the evidence in a subsequent decision. Instead, USAC sidestepped the proffered information and created a completely new justification for requiring CGRESD to repay the full amount for the two funding years.

A. THE STANDARD OF REVIEW.

Pursuant to Section 54.723 of the Commission's rules, the Wireline Competition Bureau or the Commission will conduct a *de novo* review of a decision issued by USAC.¹² As set forth below, neither the original justification for issuing the Adjustment Letters, nor the *post hoc* justification offered in the USAC Denials are correct with respect to the facts as applied to CGRESD. Because USAC has offered different justifications in the USAC Denials than was provided in the Adjustment Letters, CGRESD addresses both in the discussion below.

¹² 47 C.F.R. § 54.723.

B. ELITE FUND DID NOT EXIST DURING THE FY 2003-2004 FUNDING PERIOD.

The sole basis for USAC's issuance of the Adjustment Letter for Funding Year 2003-2004 was USAC's determination that Elite Fund was "involved in the preparation or certification" of a Form 470, while at the same time being "part of Casair."¹³ USAC rests this finding solely on a Stock Purchase Agreement between Steve Meinhardt and Roger Hoezee, effective July 1, 2006. USAC apparently concluded that because there was a Stock Purchase Agreement in 2006, Casair and Elite Funding must have been commonly owned when CGRES D prepared its Form 470 and Form 471 for Funding Year 2003-2004.

However, Fund did not come into existence until **September 17, 2003**, well after the funding process had completed for FY 2003-2004. As such, it would have been impossible for Elite Fund to provide consultant services when CGRES D submitted its Form 470 and Form 471 more than seven months earlier. The Adjustment Letter did not provide any other facts to support its determination that Elite Fund and Casair were a single entity in late 2002 and early 2003 when CGRES D sought bids for FY 2003-2004 funding and submitted its forms.

Moreover, the Adjustment Letter did not include any justification for finding CGRES D responsible for repaying USAC for "funds disbursed in violation of the programs' competitive bidding rules" other than its erroneous finding that Elite Fund

¹³ See Adjustment Letters, page 1.

and Casair were the same entity. Because it was impossible for Elite Fund to provide services to CGRES D before Elite Fund came into existence, and in the absence of any other allegations (or evidence) of program rule violations, the Adjustment Letter for Funding Year 2003–2004 was clearly in error, and CGRES D is not responsible for repayment of \$458,341.42.

Compounding these errors, the USAC Denials did not provide any additional information or evidence in support of the initial determinations that were made in the Adjustment Letters. In fact, the USAC Denial for FY 2003–2004 completely failed to even acknowledge the information provided by CGRES D. Instead, USAC apparently shifted gears, and offered a completely new justification:

During the review process, USAC gave you an opportunity to demonstrate that the competitive bidding process was not compromised and you failed to do so. Since you violated the FCC competitive bidding rules, USAC rescinded your funding request and sought recovery of any funds disbursed. On appeal, you have not demonstrated that USAC’s determination was incorrect. Consequently, your appeal is denied.¹⁴

Clearly, this statement does not rise to the required level of reasoned decision-making for which USAC is required to provide those that appear before it. Instead, it is black-letter law that a decision maker must provide some analysis beyond merely offering conclusory statements such as those provided in the USAC Denials.¹⁵

¹⁴ See USAC Denials, pgs. 1, 3.

¹⁵ See *Home Box Office, Inc. v. FCC*, 567 F.2d 9, 28, 33 (D.C. Cir.) (finding the Commission’s “generalities” crossed “the line from the tolerably terse to the intolerably mute” and rejecting “a naked allegation, unsupported in the record.”). See also *Greater Boston Television Corp. v. FCC*, 444 F.2d 841 (D.C. Cir.).

In fact, the federal courts have clearly established a bright-line standard for agencies such as the Commission and USAC:

Conclusory explanations for matters involving a central factual dispute where there is considerable evidence in conflict do not suffice to meet the deferential standards of our review. Basic principles of administrative law require the agency to "examine the relevant data and articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made."¹⁶

In contrast to this standard, nowhere in the USAC Denials was an explanation provided on *how* USAC determined that CGRES D failed to demonstrate "that USAC's determination was incorrect." In fact, USAC did not provide any justification for rejecting or otherwise not crediting CGRES D for providing information which clearly demonstrated that Elite Fund did not exist prior to September 2003.

Simply put, if Elite Fund did not exist when the purported "carbon copy" FY 2003-2004 forms were produced, USAC was required, at the very least, to explain in the USAC Denials why CGRES D's information was not correct or otherwise irrelevant. In light of its failure to provide any reasoned explanation for rejecting CGRES D's clear evidence that Elite Fund did not exist when the FY 2003-2004 forms were prepared and filed, the USAC Denial for the FY 2003-2004 period should be set aside, and the matter should be closed without further attempt to recover the fees from CGRES D.

¹⁶ See *AT&T Wireless Servs., Inc. v. FCC*, 270 F.3d 959, 968 (D.C. Cir. 2001) (citing *U.S. Telecom Ass'n v. FCC*, 227 F.3d 450, 461 (D.C. Cir. 2000) (quoting *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983))).

**C. USAC ERRONEOUSLY CREDITED ELITE FUND WITH A ROLE
IN NEGOTIATING FOR PRODUCTS AND SERVICES.**

The Adjustment Letter for Funding Year 2004–2005 made the identical finding that Elite Fund and Casair were the same entity and stated its intention to collect \$452,264.40 from CGRES D for violations of the SLD program’s competitive bidding rules. As with the FY 2003-2004 Adjustment Letter, USAC’s sole basis for issuing the FY 2004-2005 Adjustment Letter was the “evidence of a Stock Purchase Agreement between Steve Meinhardt and Roger Hoezee. In light of this “evidence,” USAC concludes—quite erroneously—that Elite Fund was responsible for acting on CGRES D’s behalf to “negotiate for eligible products and services with potential service providers.”¹⁷

However, USAC presented no evidence that Elite Fund held this role when working on behalf of CGRES D. Instead, both the Form 470 and the Form 471 filed by CGRES D for that funding period lists Mr. Chinavare as the contact person and as the person authorized to sign the forms on behalf of CGRES D. Elite Fund did not “negotiate for eligible products and services” on behalf of CGRES D. Instead, as noted above, that responsibility rested with Mr. Chinavare. Moreover, the final decision was not made by Elite Fund or by Mr. Chinavare, but rather by the CGRES D Board of Education.

Thus, while it may be correct that Elite Fund and Casair shared a common sole shareholder, Mr. Steve Meinhardt, at some point during the period in question, there is no evidence that, in the instant matter, as applied to CGRES D, the common control of

¹⁷ See Adjustment Letters, Exhibit One.

Elite Fund and Casair led to SLD program violations with respect to CGRES D. Instead, Mr. Chinavare served as contact person and chief negotiator for the requested goods and services to be obtained from service providers.

The Commission has determined that the FCC Form 470 contact person is in a unique position to influence the decision-making process.¹⁸ In particular, the Commission has found that the “contact person exerts great influence over an applicant’s competitive bidding process by controlling the dissemination of information regarding the services requested.”¹⁹ In the instant case, Mr. Chinavare was the only person authorized to sign on CGRES D’s behalf and was the only listed person to receive the bids from potential service providers. In light of the controlling FCC precedent at the time with respect to the preparation of FCC Forms 470 and 471, there was no basis for USAC to conclude in the Adjustment Letter that there were violations of the SLD program’s competitive bidding rules.²⁰

Moreover, the USAC Denial for FY 2004–2005 funding period did not provide *any* discussion as to why this explanation was insufficient or otherwise legally infirm. Instead, USAC only offered the following statement: “On appeal, you have not

¹⁸ See *Request for Review by MasterMind Internet Services, Inc., et al.*, 16 FCC Rcd 4028 (2000).

¹⁹ *Id.*, 16 FCC Rcd at 4033.

²⁰ *Id.*, 16 FCC Rcd at 4034–4035 (“To the extent that the applications at issue here were denied by SLD in instances that the Applicant did not name a MasterMind employee as the contact person and a MasterMind employee did not sign the associated Forms 470 or 471, we do not believe that there has been a violation of the competitive bidding process.”)

demonstrated that USAC’s determination was incorrect.”²¹ CGRES D respectfully submits that the evidence provided in its Appeal conclusively established the basis for concluding why “USAC’s determination was incorrect.”

In particular, CGRES D demonstrated that its actions in preparing the FCC Form 470 and FCC Form 471, serving as the point-of-contact person, and signing the forms, clearly established that CGRES D complied with the Commission’s rules. Moreover, as explained in the *Academy of Careers and Technologies* decision, USAC is required to:

review these applications fully, and should not issue summary denials of requests for funding solely because applications contain similar language. If an entity is able to demonstrate that it fully complied with all program rules and did not, for example, violate the Commission’s competitive bidding rules, then USAC should not deny funding on the basis of the “pattern analysis” procedure.²²

In the USAC Denials, USAC used the language “carbon copy” to characterize “FCC Forms 470 across a series of applications” without any evidence that it conducted the additional analysis required by the Commission when it reviewed CGRES D’s applications. Absent from the USAC denials was any information or other evidence connecting the applications submitted by CGRES D to any other application. In fact, USAC even failed to identify the other serial applications with which CGRES D was to be associated as “carbon copies.” Therefore, the USAC Denial with respect to the FY 2004–2005 Funding Period must be set aside, and the matter must be closed with no further attempt to recover funds from CGRES D.

²¹ See USAC Denials, pg. 3.

²² See 21 FCC Rcd 5398, ¶ 8 (2006).

D. ALTERNATIVELY, USAC MUST LOOK TO CASAIR AND ELITE FUND TO RECOVER DISBURSEMENTS.

Finally, to the extent that the Commission agrees with USAC that Elite Fund played an impermissible role of both consultant and service provider during either of the two funding periods, the Commission must look to Casair and/or Elite Fund to recover disbursements in question.²³

As noted, there should be no question that Elite Fund could not have served as CGRES D's consultant for FY 2003–2004 because it did not come into existence until seven months after that year's Form 471 had been filed. Moreover, it is clear that CGRES D's Technical Director, Ken Chinavare, served as the sole point of contact and authorized person to receive bids for both funding periods. In fact, the only evidence presented by USAC in the Adjustment Letters to support its allegation that there were SLD program violations in either FY 2003–2004 or FY 2004–2005 is the existence of the 2006 Stock Purchase Agreement. In turn, the USAC Denials completely ignored the evidence filed by CGRES D, and proffered a completely new justification.

Therefore, to the extent that the 2006 Stock Purchase Agreement is evidence of a SLD program violation, it is clear that Elite Fund and Casair were in the sole position “to prevent these rule violations” because “there is no evidence in the record demonstrating that [CGRES D was] aware of the relationship between” Elite Fund and Casair.²⁴

²³ Pursuant to Section 54.721(d) of the Commission's rules, a copy of this Request for Review is being served on Casair and Elite Fund.

²⁴ See *Achieve Telecom Network of MA*, 30 FCC Rcd 3653, 3672 (WCB 2015).

Previously, the Commission has directed USAC to discontinue recovery efforts against the educational institutions, and to “continue its recovery actions against” the entities responsible for the deception.²⁵ In fact, when the Commission modified its rules and policies in 2004 to enhance USAC’s recovery procedures, it directed USAC to determine liability on the basis of which parties were in a “better position” to prevent the rule violations.²⁶

Because USAC failed in both the Adjustment Letters and the USAC Denials to provide any evidence that anyone associated with CGRES D had knowledge of the purported common ownership of Casair and Elite Fund by Steve Meinhardt, the Commission must set aside the USAC Denials, immediately cease recovery efforts against CGRES D, and look to Casair and Elite Fund to return any necessary disbursements for the respective funding periods.

CONCLUSION

Therefore, it is clear that CGRES D should not be held responsible for any potential competitive bidding rule violations that may have occurred between 2003 and 2005 with respect to the shareholders of Casair and Elite Fund. Not only did Elite Fund not even exist prior to the submission of CGRES D’s FY 2003-2004 applications,

²⁵ *Id.*, 30 FCC Rcd at 3655, nt. 11 (citing *Request for Review of the Decision by the Universal Service Administrator by Bell South Telecommunications, Inc. and Union Parish School Board*, Order, 27 FCC Rcd 11208 (WCB 2012)).

²⁶ *See Federal-State Joint Board on Universal Service; Changes to the Board of Directors for the National Exchange Carrier Association, Inc.; Schools and Libraries Universal Service Support Mechanism*, Order on Reconsideration and Fourth Report and Order, 19 FCC Rcd 15252, 15257 (2004).

CGRES D has demonstrated that it was in complete control of its applications and the decision-making process throughout the time period.

USAC's first justification for recovering disbursed funds from CGRES D was demonstrated to be impossible in light of Elite Fund's lack of corporate existence. USAC's more recent justification also fails because (i) it ignores the facts presented in CGRES D's Appeal, (ii) it raises a completely new justification without providing any supporting evidence, and (iii) it ignores well-established Commission precedent that places the responsibility for any required reimbursement on the parties that were in the best position to know about the purported violations.

As a publically funded, rural educational service district, CGRES D simply does not have access to almost \$1 million to return to USAC more than 12 years after the last funding disbursement, especially when USAC has utterly failed to establish an obligation to do so. While CGRES D acknowledges that the Commission and USAC have a vested interest in requiring those parties that receive USAC funds to comply with its rules, CGRES D respectfully submits that it has demonstrated, without question, that its actions during the period in question complied with all applicable Commission rules and policies.

As such, Clare-Gladwin Regional Education Service District requests that the Commission set aside the USAC Denials issued on August 23, 2017, and direct USAC to immediately cease collection efforts against it. If the Commission ultimately determines that the competitive bidding rules were compromised through the common ownership of

Casair and Elite Fund by Mr. Meinhardt, CGRESB respectfully urges the Commission to pursue recovery only from the parties that were responsible for the rule violations.

Respectfully submitted,

**CLARE-GLADWIN REGIONAL
EDUCATION SERVICE DISTRICT**

By: 

Lee G. Petro

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(202) 230-5857

Its Counsel

October 23, 2017

EXHIBIT ONE

Funding Commitment Adjustment Report for
Form 471 Application Number: 420735

Funding Request Number:	1159681
Services Ordered:	INTERNET ACCESS
SPIN:	143004346
Service Provider Name:	Crystal Automation Systems Inc
Contract Number:	N/A
Billing Account Number:	
Site Identifier:	131099
Original Funding Commitment:	\$452,264.40
Commitment Adjustment Amount:	\$452,264.40
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date	\$452,264.40
Funds to be Recovered from Applicant:	\$452,264.40
Funding Commitment Adjustment Explanation:	

After a thorough investigation, it has been determined that this funding commitment must be rescinded in full. USAC has evidence of a stock purchase agreement between Steven R Meinhardt of Casair, Inc., and Roger Hoezee, which was effective July 1, 2006. In this agreement, Meinhardt sold Elite Fund to Hoezee. This purchase demonstrates that the two companies, Casair and Elite Fund, were a single entity prior to July 1, 2006. During the time when Elite Fund, Inc. was a part of Casair, Inc., Elite is considered a service provider and therefore cannot act as an independent consultant on behalf of applicant or assist them with those tasks that service providers are prohibited from undertaking. The FCC Form 470 must be completed by the entity that will negotiate for eligible products and services with potential service providers and cannot be a service provider. Furthermore, service providers that participate in the competitive bidding process as a bidder cannot be involved in the preparation or certification of the entitys FCC Form 470. Because Elite Fund executed these tasks while it was part of Casair, the applicant was not in compliance with FCC rules which require applicants to conduct a fair and open competitive bidding process free from conflicts of interest. Accordingly, the applicant should not have a relationship with a service provider prior to the competitive bidding that would unfairly influence the outcome of a competition or would furnish the service provider with "inside" information or allow it to unfairly compete in any way. By having the service provider engaged in the preparation and submission of its Form 470, the applicant surrendered control of the competitive bidding process to the service provider who participated in the competitive bidding process as a bidder. Accordingly, the commitment will be rescinded in full and USAC will seek recovery of any funds disbursed in violation of the programs competitive bidding rules from the applicant and the service provider.

Funding Commitment Adjustment Report for
Form 471 Application Number: 369768

Funding Request Number:	1008157
Services Ordered:	INTERNET ACCESS
SPIN:	143004346
Service Provider Name:	Crystal Automation Systems Inc
Contract Number:	CAS-Q2163
Billing Account Number:	N/A
Site Identifier:	131099
Original Funding Commitment:	\$458,341.42
Commitment Adjustment Amount:	\$458,341.42
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date	\$458,341.42
Funds to be Recovered from Applicant:	\$458,341.42
Funding Commitment Adjustment Explanation:	

After a thorough investigation, it has been determined that this funding commitment must be rescinded in full. USAC has evidence of a stock purchase agreement between Steven R Meinhardt of Casair, Inc., and Roger Hoezee, which was effective July 1, 2006. In this agreement, Meinhardt sold Elite Fund to Hoezee. This purchase demonstrates that the two companies, Casair and Elite Fund, were a single entity prior to July 1, 2006. During the time when Elite Fund, Inc. was a part of Casair, Inc., Elite is considered a service provider and therefore cannot act as an independent consultant on behalf of applicant or assist them with those tasks that service providers are prohibited from undertaking. The FCC Form 470 must be completed by the entity that will negotiate for eligible products and services with potential service providers and cannot be a service provider. Furthermore, service providers that participate in the competitive bidding process as a bidder cannot be involved in the preparation or certification of the entity's FCC Form 470. Because Elite Fund executed these tasks while it was part of Casair, the applicant was not in compliance with FCC rules which require applicants to conduct a fair and open competitive bidding process free from conflicts of interest. Accordingly, the applicant should not have a relationship with a service provider prior to the competitive bidding that would unfairly influence the outcome of a competition or would furnish the service provider with "inside" information or allow it to unfairly compete in any way. By having the service provider engaged in the preparation and submission of its Form 470, the applicant surrendered control of the competitive bidding process to the service provider who participated in the competitive bidding process as a bidder. Accordingly, the commitment will be rescinded in full and USAC will seek recovery of any funds disbursed in violation of the programs competitive bidding rules from the applicant and the service provider.

EXHIBIT TWO



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2003-2004

August 23, 2017

Lee Petro
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1500 K Street, N.W.
Washington, DC 20005-1209

Re: Applicant Name: CLARE-GLADWIN RESD
Billed Entity Number: 131099
Form 471 Application Number: 369768
Funding Request Number(s): 1008157
Your Correspondence Dated: August 01, 2017

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2003 Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1008157
Decision on Appeal: **Denied**
Explanation:

- USAC determined that the service provider was improperly involved in the competitive bidding process. During the review process, USAC gave you an opportunity to demonstrate that the competitive bidding process was not compromised and you failed to do so. Since you violated the FCC competitive bidding rules, USAC rescinded your funding request and sought recovery of any funds disbursed. On appeal, you have not demonstrated that USAC's determination was incorrect. Consequently, your appeal is denied.

FCC rules require that, except under limited circumstances, an eligible school, library or consortium that includes an eligible school or library shall seek competitive bids for all services eligible for support and must conduct a fair and open competitive bidding process. See 47 C.F.R. sec. 54.503(a) and (b). An applicant violates the FCC's competitive bidding requirements when it surrenders control of the bidding process to a

service provider who participated in the competitive bidding process as a bidder. See Request for Review of the Decisions of the Universal Service Administrator by Mastermind Internet Services, Inc, Federal-State Joint Board on Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association, Inc., CC Docket Nos. 96-45, Order, 16 FCC Rcd 4028, FCC 00-167 para. 9-10 (rel. May 23, 2000). In cases where the Administrator finds "carbon copy" FCC Forms 470 across a series of applications, especially where the services and products requested are complex or substantial, and when the same service provider is involved, it is appropriate for the Administrator to subject such applications to more searching scrutiny to ensure there has been no improper service provider involvement in the competitive bidding process. See Request for Review of the Decision of the Universal Service Administrator by Ysleta Independent School District, El Paso, Texas, et al., Federal State Joint Board on Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association, Inc., SLD Nos. 321479, et al., CC Docket Nos. 96-45, 97-21, Order, FCC 03-313 para. 30 (rel. Dec. 8, 2003). The FCC's Fifth Report and Order requires recovery of all funds disbursed for any funding request for which the competitive bidding rules have been violated. See Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Fifth Report and Order and Order, 19 FCC Rcd 15815-15816, FCC 04-190 para. 21 (rel. Aug. 13, 2004).

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2004-2005

August 23, 2017

Lee Petro
Drinker Biddle & Reath
1500 K Street, N.W.
Washington, DC 20005-1209

Re: Applicant Name: CLARE-GLADWIN RESD
Billed Entity Number: 131099
Form 471 Application Number: 420735
Funding Request Number(s): 1159681
Your Correspondence Dated: August 01, 2017

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2004 Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1159681
Decision on Appeal: **Denied**
Explanation:

- USAC determined that the service provider was improperly involved in the competitive bidding process. During the review process, USAC gave you an opportunity to demonstrate that the competitive bidding process was not compromised and you failed to do so. Since you violated the FCC competitive bidding rules, USAC rescinded your funding request and sought recovery of any funds disbursed. On appeal, you have not demonstrated that USAC's determination was incorrect. Consequently, your appeal is denied.

FCC rules require that, except under limited circumstances, an eligible school, library or consortium that includes an eligible school or library shall seek competitive bids for all services eligible for support and must conduct a fair and open competitive bidding process. See 47 C.F.R. sec. 54.503(a) and (b). An applicant violates the FCC's competitive bidding requirements when it surrenders control of the bidding process to a

service provider who participated in the competitive bidding process as a bidder. See Request for Review of the Decisions of the Universal Service Administrator by Mastermind Internet Services, Inc, Federal-State Joint Board on Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association, Inc., CC Docket Nos. 96-45, Order, 16 FCC Rcd 4028, FCC 00-167 para. 9-10 (rel. May 23, 2000). In cases where the Administrator finds "carbon copy" FCC Forms 470 across a series of applications, especially where the services and products requested are complex or substantial, and when the same service provider is involved, it is appropriate for the Administrator to subject such applications to more searching scrutiny to ensure there has been no improper service provider involvement in the competitive bidding process. See Request for Review of the Decision of the Universal Service Administrator by Ysleta Independent School District, El Paso, Texas, et al., Federal State Joint Board on Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association, Inc., SLD Nos. 321479, et al., CC Docket Nos. 96-45, 97-21, Order, FCC 03-313 para. 30 (rel. Dec. 8, 2003). The FCC's Fifth Report and Order requires recovery of all funds disbursed for any funding request for which the competitive bidding rules have been violated. See Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Fifth Report and Order and Order, 19 FCC Rcd 15815-15816, FCC 04-190 para. 21 (rel. Aug. 13, 2004).

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

EXHIBIT THREE

**Before the
UNIVERSAL SERVICE ADMINISTRATOR COMPANY
SCHOOLS AND LIBRARIES DIVISION**

In The Matter of:]	
]	
CLARE-GLADWIN REGIONAL EDUCATION SERVICE DISTRICT]	Administrator Correspondence - June 2, 2017
]	
]	Billed Entity Number: 131099
Notification of Commitment Adjustment]	FCC Registration Number: 0012-0389-56
Letter for]	Funding Request Numbers: 1008157, 1159681
Funding Years 2003-2004, 2004-2005.]	Form 471 Numbers: 369768, 420735

APPEAL

Clare-Gladwin Regional Education Service District (CGRES D), by and through its attorney, and pursuant to Section 54.719(a) of the Commission's rules,¹ hereby submits this Appeal of the "Commitment Adjustment Letter" for Funding Year July 1, 2003 – June 30, 2004, and the "Commitment Adjustment Letter" for Funding Year July 1, 2004 – June 30, 2005 (the "Adjustment Letters"), issued by the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC").

The Adjustment Letter for Funding Year 2003-2004 requests that CGRES D repay USAC the amount of \$458,341.42, and the Adjustment Letter for Funding Year 2004-2005 requests the repayment of \$452,264.40. In both instances, the requested repayment amount represents the full amount received by CGRES D from USAC for the respective funding years.

The sole basis expressed in both Adjustment Letters was that the service provider selected in those two years – Crystal Automation Systems, Inc. ("CASAIR") – and CGRES D's consultant – Elite Fund, Inc. – were commonly-owned by Mr. Steven Meinhardt during the two funding periods in question. Because of the common ownership of CASAIR and Elite Fund, the

¹ 47 C.F.R. § 54.719(a) (2017).

Adjustment Letter determined that Elite Fund could not serve as a consultant.² Based on this finding, the Adjustment Letter indicated that "USAC will seek recovery of any funds disbursed in violation of the programs competitive bidding rules from the applicant and the service provider." *Id.*

As discussed below, CGRES D requests that USAC reconsider this determination. First, the Adjustment Letter's determination that Elite Fund assisted with the preparation of CGRES D's Funding Year 2003-2004 Form 470 and Form 471 is in error. CGRES D did not use Elite Fund to assist in the preparation of these forms, as they were submitted prior to the incorporation of Elite Fund in September 2003. Therefore, the determination that the SLD's program competitive bidding procedures were compromised for the Funding Year 2003-2004 is in error, and should be reversed.

Moreover, CGRES D complied with the SLD's program rules by correctly identifying a point of contact and party authorized to negotiate for eligible products and services during both funding periods. Elite Fund was not identified in the forms submitted with USAC, and CGRES D personnel conducted the review of the received bids, with the CGRES D Board of Education making the final decision.

Finally, the recovery of disbursements from CGRES D made during either funding year would be inappropriate because CGRES D was not aware that Elite Fund and CASAIR were commonly owned prior to the submission of the Funding Year 2004-2005 forms. In dealing with CGRES D, both entities maintained separate points of contact with CGRES D and represented to CGRES D that they were two separate entities with different officers. Under well-established precedent, the parties most likely to know there had been a possible violation of USAC's rules and procedures were CASAIR and Elite Funding, not CGRES D.

² Copies of the Funding Commitment Adjustment Reports are attached as Exhibit A.

Thus, as discussed below, the determination that the Funding Year 2003-2004 payments should be recovered due to the common ownership of Elite Fund and CASAIR is in error. Furthermore, to the extent that USAC seeks to recover the Funding Year 2004-2005 payments, that recovery should come from the parties seeking to obfuscate their relationship, and not a rural school district which acted in good faith to comply with USAC's rules and policies.

BACKGROUND

Clare-Gladwin Regional Education Service District is one of 56 Intermediate School Districts, or Education Service Agencies, in Michigan. ISDs were created by the State of Michigan, and organized along county boundaries, to provide specialized educational services to local school districts. Specialized services include those that are done more cost effectively when done in collaboration rather than separately. Specialized services and programs include special education, career and technical education, training for teachers and other school staff, business services, and technology services.

Created in 1962, CGRES D offers these services to five school districts³ in the rural counties of Clare and Gladwin.⁴ In an effort to save costs for the five local school districts, CGRES D has provided future-driven leadership in technology since the 1990s when CGRES D, the local school districts, and the local community college collaborated to install a high-speed fiber network in the two-county region. In addition to investing General Fund dollars, CGRES D sought grant-funding and state and federal funding to offset technology costs.

CGRES D received USAC funding for services provided by CASAIR – one of the few service companies in this rural area – for Funding Years 2001-2002, 2002-2003, 2003-2004, and

³ CGRES D serves Beaverton Rural Schools, Clare Public Schools, Farwell Area Schools, Gladwin Community Schools and Harrison Community Schools.

⁴ See Exhibit B. According to the 2010 Census, Claire County is 70.6% rural, and Gladwin County is 88.6% rural. The respective populations of the communities are provided as Exhibit C and Exhibit D respectfully.

2004-2005. During this period, CGRES D's Technology Department, consisting of just one person, Mr. Ken Chinavare, (i) was listed as the contact person for both the Form 470 and Form 471, (ii) was the authorized party to sign the forms, (iii) reviewed the bids, (iv) answered questions from bidders prior to the bid deadline, (v) evaluated the bids received, and (vi) made the recommendation to the CGRES D Superintendent and Board of Education.

For Funding Year 2003-2004, CGRES D filed its Form 470 application on October 7, 2002.⁵ That application included the required RFP, outlining the services to be offered to CGRES D by interested bidders. On November 15, 2002, CASAIR submitted its bid,⁶ and the Form 471 was filed on February 3, 2003.⁷ As noted above, Elite Fund, Inc., was incorporated after the Form 471 was submitted by CGRES D. In fact, Elite Fund was not incorporated until seven months later, on September 17, 2003.⁸

For Funding Year 2004-2005, CGRES D received a bid from CASAIR in response to its FCC Form 470, and CGRES D was able to calculate the cost of its requirements should they be provided by a second company, Merit Network, Inc. Merit's prices were listed on the MiCTA website. CGRES D determined that CASAIR's bid was substantially less expensive than what Merit would charge - \$628,145 vs. \$889,490, and Merit would not have been able to provide the required Internet bandwidth due to transport issues, nor could it offer the necessary firewall support, proxy, cache and content services. Because CASAIR's proposal was substantially less expensive and CASAIR could provide the required services, CGRES D accepted CASAIR's proposal, and the Form 471 was filed.

⁵ See Exhibit E.

⁶ See Exhibit F.

⁷ See Exhibit G.

⁸ See Exhibit H.

Most important for the instant matter is the fact that Elite Fund did not participate in CGRES D's review of the bid proposals. Instead, Mr. Ken Chinavare, the Technology Director for CGRES D reviewed the bid proposals, and made a recommendation to CGRES D's Board of Education. CGRES D's Board of Education agreed with Mr. Chinavare's recommendation, and CASAIR was selected.

DISCUSSION

The Adjustment Letters erroneously assumed that Elite Fund played a role in the preparation of the Funding Year 2003-2004 application. This assumption served as the sole basis for the issuance of the Adjustment Letter for Funding Year 2003-2004, and must be reconsidered in light of Elite Fund's lack of corporate existence until well after the funding decisions were made by USAC. Therefore, the Adjustment Letter for Funding Year 2003-2004 must be reconsidered.

Further, to the extent that Elite Fund played a role in the preparation of CGRES D's Form 470 or Form 471 for Funding Year 2004-2005, that assistance was provided to CGRES D without Elite Fund or CASAIR informing CGRES D that the two entities were commonly owned by Steve Meinhardt. As such, under well-established Commission precedent, and in light of USAC's efforts to collect the funding from CASAIR, the Adjustment Letter for Funding Year 2004-2005 must be reconsidered.

A. Elite Fund Did Not Exist During Applicable Period for Funding Year 2003-2004.

The sole basis for USAC's issuance of the Adjustment Letter for Funding Year 2003-2004 was USAC's determination that Elite Fund was "involved in the preparation or

certification” of a Form 470, while at the same time being “part of CASAIR.”⁹ USAC rests this finding solely on a Stock Purchase Agreement between Steve Meinhardt and Roger Hoezee, effective July 1, 2006. USAC apparently concluded that because there was a Stock Purchase Agreement in 2006, CASAIR and Elite Funding must have been commonly owned when CGRES D prepared its Form 470 and Form 471 for Funding Year 2003-2004.

However, as provided above, Elite Fund did not come into existence until September 17, 2003. As such, it would have been impossible for Elite Fund to provide consultant services when CGRES D submitted Form 470 and Form 471 seven months earlier. The Adjustment Letter did not provide any other facts to support its determination that Elite Fund and CASAIR were a single entity in late 2002 and early 2003 when CGRES D sought bids for Funding Year 2003-2004.

Moreover, the Adjustment Letter did not include any justification for finding CGRES D responsible for repaying USAC for “funds disbursed in violation of the programs’ competitive bidding rules” other than its erroneous finding that Elite Fund and CASAIR were the same entity. Because it was impossible for Elite Fund to provide services to CGRES D before Elite Fund came into existence, and in the absence of any other allegations (or evidence) of program rule violations, the Adjustment Letter for Funding Year 2003-2004 must be reconsidered and CGRES D must not be found liable for repayment of \$458,341.42.

B. USAC Erroneously Credited Elite Fund With Role in Negotiation for Products and Services.

The Adjustment Letter for Funding Year 2004-2005 made the identical finding that Elite Fund and CASAIR were the same entity, and stated its intention to collect \$452,264.40 from CGRES D for violations of the SLD program’s competitive bidding rules. As noted above, the

⁹ See Adjustment Letter.

sole basis for issuing the Adjustment Letter was the “evidence of a Stock Purchase Agreement between Steve Meinhardt and Roger Hoezee. In light of this “evidence,” USAC concludes – quite erroneously – that Elite Fund was responsible for acting on CGRESD’s behalf to “negotiate for eligible products and services with potential services providers.”

However, USAC presented no evidence that Elite Fund held this role when working on behalf of CGRESD. Instead, both the Form 470 and the Form 471 filed by CGRESD for that funding period lists Mr. Chinavare as the contact person, and as the person authorized to sign the forms on behalf of CGRESD.¹⁰ Elite Fund did not “negotiate for eligible products and services” on behalf of CGRESD. Instead, as noted above, that responsibility rested with Mr. Chinavare. Moreover, the final decision was not made by Elite Fund or Mr. Chinavare, but rather by the CGRESD Board of Education.

Thus, while it may be correct that Elite Fund and CASAIR shared a common sole shareholder, Mr. Steve Meinhardt, during the period in question, there is no evidence that, in the instant matter, the common control of Elite Fund and CASAIR led to SLD program violations. Instead, Mr. Chinavare served as contact person and chief negotiator for the requested goods and services to be obtained from service providers.

The Commission has determined that the FCC Form 470 contact person is in a unique position to influence the decision making process.¹¹ In particular, the Commission has found that the “contact person exerts great influence over an applicant’s competitive bidding process by controlling the dissemination of information regarding the services requested.”¹² In the instant case, Mr. Chinavare was the only person authorized to sign on CGRESD’s behalf, and the only

¹⁰ See Exhibit I.

¹¹ See *Request for Review by MasterMind Internet Services, Inc., et al.*, 16 FCC Rcd 4028 (2000).

¹² *Id.*, 16 FCC Rcd at 4033.

listed person to receive the bids from potential service providers. Thus, there was no basis for USAC to conclude that there were violations of the SLD program's competitive bidding rules.

C. USAC Must Look to CASAIR and Elite Fund To Recover Disbursements.

Finally, even if USAC concludes that Elite Fund played the dual role of consultant and service provider during either of the two funding periods, USAC must look to CASAIR and Elite Fund to recover disbursements in question.

As noted, there should be no question that Elite Fund could not have served as CGRESD's consultant for Funding Year 2003-2004 because it did not come into existence until seven months after the Form 471 was filed. Moreover, it is clear that CGRESD's Technical Director, Ken Chinavare served as the sole point of contact and authorized person to receive bids for both funding periods. In fact, the only evidence presented by USAC to support its allegation that there were SLD program violations in either Funding Year 2003-2004 or Funding Year 2004-2005 is the existence of the 2006 Stock Purchase Agreement.

Therefore, to the extent that the 2006 Stock Purchase Agreement is evidence of a SLD program violation, it is clear that Elite Fund and CASAIR were in the sole position "to prevent these rule violations" because "there is no evidence in the record demonstrating that [CGRESD was] aware of the relationship between" Elite Fund and CASAIR.¹³ In past occasions with similar circumstances, the Commission has directed USAC to discontinue recovery efforts against the educational institutions, and "continue its recovery actions against" the entities responsible for the deception.¹⁴ In fact, when the Commission modified its rules and policies in 2004 to enhance USAC's recovery procedures, it directed USAC to determine liability based on

¹³ See *Achieve Telecom Network of MA*, 30 FCC Rcd 3653, 3672 (WCB 2015).

¹⁴ *Id.*, 30 FCC Rcd at 3655, nt. 11 (citing *Request for Review of the Decision by the Universal Service Administrator by Bell South Telecommunications, Inc. and Union Parish School Board*, Order, 27 FCC Rcd 11208 (WCB 2012)).

which parties were in a “better position” to prevent the rule violations.¹⁵ Because USAC failed to provide any evidence that anyone associated with CGRES D had knowledge of the apparent common ownership of CASAIR and Elite Fund by Steve Meinhardt, USAC must immediately cease recovery efforts against CGRES D, and look to CASAIR and Elite Fund to return any necessary disbursements for the respective funding periods.

CONCLUSION

CGRES D has provided clear evidence that it followed the SLD program rules as they relate to the institutions seeking funding from USAC. The only evidence presented by USAC to the contrary is the existence of a 2006 Stock Purchase Agreement between Steve Meinhardt and Roger Hoezee. From the mere existence of this agreement, USAC has made the erroneous jump to conclude that Elite Fund “executed tasks” relating to the negotiation for eligible products and services on behalf of CGRES D more than 14 years ago.

In response, CGRES D has demonstrated that it was impossible for Elite Fund to provide these consulting services prior to Elite Fund’s incorporation, thus invalidating the reclamation of the Funding Year 2003-2004 disbursements. Moreover, CGRES D has provided evidence that its Technology Director, Mr. Ken Chinavare, was the sole point of contact and the person authorized to sign the Form 470 and Form 471 for both funding periods. To the extent that USAC seeks to recover any of the disbursed funds, it must look to CASAIR and Elite Fund as these entities are the parties that were best positioned to prevent the SLD program violations.

Therefore, Clare-Gladwin Regional Education Service District respectfully requests that the Universal Service Administrative Company reconsider the determinations made in the

¹⁵ See *Federal-State Joint Board on Universal Service; Changes to the Board of Directors for the National Exchange Carrier Association, Inc.; Schools and Libraries Universal Service Support Mechanism*, Order on Reconsideration and Fourth Report and Order, 19 FCC Rcd 15252, 15257 (2004).

Funding Commitment Adjustment Reports, and cease attempting to recover from CGRES D the disbursements for Funding Years 2003-2004 and 2004-2005.

Respectfully submitted,

**CLARE-GLADWIN REGIONAL
EDUCATION SERVICE DISTRICT**

By: 

Lee G. Petro

DRINKER BIDDLE & REATH LLP

1500 K Street N.W.

Suite 1100

Washington, DC 20005-1209

(202) 230-5857

Its Counsel

August 1, 2017

EXHIBIT A

Funding Commitment Adjustment Report for
Form 471 Application Number: 369768

Funding Request Number:	1008157
Services Ordered:	INTERNET ACCESS
SPIN:	143004346
Service Provider Name:	Crystal Automation Systems Inc
Contract Number:	CAS-Q2163
Billing Account Number:	N/A
Site Identifier:	131099
Original Funding Commitment:	\$458,341.42
Commitment Adjustment Amount:	\$458,341.42
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date	\$458,341.42
Funds to be Recovered from Applicant:	\$458,341.42
Funding Commitment Adjustment Explanation:	

After a thorough investigation, it has been determined that this funding commitment must be rescinded in full. USAC has evidence of a stock purchase agreement between Steven R Meinhardt of Casair, Inc., and Roger Hoezee, which was effective July 1, 2006. In this agreement, Meinhardt sold Elite Fund to Hoezee. This purchase demonstrates that the two companies, Casair and Elite Fund, were a single entity prior to July 1, 2006. During the time when Elite Fund, Inc. was a part of Casair, Inc., Elite is considered a service provider and therefore cannot act as an independent consultant on behalf of applicant or assist them with those tasks that service providers are prohibited from undertaking. The FCC Form 470 must be completed by the entity that will negotiate for eligible products and services with potential service providers and cannot be a service provider. Furthermore, service providers that participate in the competitive bidding process as a bidder cannot be involved in the preparation or certification of the entity's FCC Form 470. Because Elite Fund executed these tasks while it was part of Casair, the applicant was not in compliance with FCC rules which require applicants to conduct a fair and open competitive bidding process free from conflicts of interest. Accordingly, the applicant should not have a relationship with a service provider prior to the competitive bidding that would unfairly influence the outcome of a competition or would furnish the service provider with "inside" information or allow it to unfairly compete in any way. By having the service provider engaged in the preparation and submission of its Form 470, the applicant surrendered control of the competitive bidding process to the service provider who participated in the competitive bidding process as a bidder. Accordingly, the commitment will be rescinded in full and USAC will seek recovery of any funds disbursed in violation of the programs competitive bidding rules from the applicant and the service provider.

Funding Commitment Adjustment Report for
Form 471 Application Number: 420735

Funding Request Number:	1159681
Services Ordered:	INTERNET ACCESS
SPIN:	143004346
Service Provider Name:	Crystal Automation Systems Inc
Contract Number:	N/A
Billing Account Number:	
Site Identifier:	131099
Original Funding Commitment:	\$452,264.40
Commitment Adjustment Amount:	\$452,264.40
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date	\$452,264.40
Funds to be Recovered from Applicant:	\$452,264.40
Funding Commitment Adjustment Explanation:	

After a thorough investigation, it has been determined that this funding commitment must be rescinded in full. USAC has evidence of a stock purchase agreement between Steven R Meinhardt of Casair, Inc., and Roger Hoezee, which was effective July 1, 2006. In this agreement, Meinhardt sold Elite Fund to Hoezee. This purchase demonstrates that the two companies, Casair and Elite Fund, were a single entity prior to July 1, 2006. During the time when Elite Fund, Inc. was a part of Casair, Inc., Elite is considered a service provider and therefore cannot act as an independent consultant on behalf of applicant or assist them with those tasks that service providers are prohibited from undertaking. The FCC Form 470 must be completed by the entity that will negotiate for eligible products and services with potential service providers and cannot be a service provider. Furthermore, service providers that participate in the competitive bidding process as a bidder cannot be involved in the preparation or certification of the entity's FCC Form 470. Because Elite Fund executed these tasks while it was part of Casair, the applicant was not in compliance with FCC rules which require applicants to conduct a fair and open competitive bidding process free from conflicts of interest. Accordingly, the applicant should not have a relationship with a service provider prior to the competitive bidding that would unfairly influence the outcome of a competition or would furnish the service provider with "inside" information or allow it to unfairly compete in any way. By having the service provider engaged in the preparation and submission of its Form 470, the applicant surrendered control of the competitive bidding process to the service provider who participated in the competitive bidding process as a bidder. Accordingly, the commitment will be rescinded in full and USAC will seek recovery of any funds disbursed in violation of the programs competitive bidding rules from the applicant and the service provider.

EXHIBIT B

Table 7.

Population by Urban and Rural: 2010

[For information on confidentiality, nonsampling error, and definitions, see Appendixes]

State County/County Equivalent	Total population	Urban			Rural			Percent of total population	
		Total	In urbanized area	In urban cluster	Total	In place	Not in place	Urban	Rural
Michigan	9,883,640	7,369,957	6,560,163	809,794	2,513,683	326,784	2,186,899	74.6	25.4
Alcona County	10,942	118	—	118	10,824	2,144	8,680	1.1	98.9
Alger County	9,601	2,972	—	2,972	6,629	803	5,826	31.0	69.0
Allegan County	111,408	39,586	9,558	30,028	71,822	2,892	68,930	35.5	64.5
Alpena County	29,598	14,258	—	14,258	15,340	1,119	14,221	48.2	51.8
Antrim County	23,580	—	—	—	23,580	6,982	16,598	—	100.0
Arenac County	15,899	—	—	—	15,899	3,536	12,363	—	100.0
Baraga County	8,860	—	—	—	8,860	4,544	4,316	—	100.0
Barry County	59,173	13,534	—	13,534	45,639	4,598	41,041	22.9	77.1
Bay County	107,771	75,104	75,104	—	32,667	1,317	31,350	69.7	30.3
Benzie County	17,525	—	—	—	17,525	4,515	13,010	—	100.0
Berrien County	156,813	105,289	89,824	15,465	51,524	9,786	41,738	67.1	32.9
Branch County	45,248	16,876	—	16,876	28,372	4,222	24,150	37.3	62.7
Calhoun County	136,146	93,972	77,325	16,647	42,174	5,324	36,850	69.0	31.0
Cass County	52,293	15,070	8,988	6,082	37,223	3,335	33,888	28.8	71.2
Charlevoix County	25,949	7,680	—	7,680	18,269	5,040	13,229	29.6	70.4
Cheboygan County	26,152	4,517	—	4,517	21,635	3,005	18,630	17.3	82.7
Chippewa County	38,520	19,669	—	19,669	18,851	1,863	16,988	51.1	48.9
Clare County	30,926	9,079	—	9,079	21,847	607	21,240	29.4	70.6
Clinton County	75,382	35,485	27,060	8,425	39,897	8,911	30,986	47.1	52.9
Crawford County	14,074	3,858	—	3,858	10,216	10	10,206	27.4	72.6
Delta County	37,069	20,850	—	20,850	16,219	691	15,528	56.2	43.8
Dickinson County	26,168	17,594	—	17,594	8,574	1,415	7,159	67.2	32.8
Eaton County	107,759	66,841	48,751	18,090	40,918	5,255	35,663	62.0	38.0
Emmet County	32,694	8,210	—	8,210	24,484	5,347	19,137	25.1	74.9
Genesee County	425,790	354,448	351,608	2,840	71,342	3,857	67,485	83.2	16.8
Gladwin County	25,692	2,934	—	2,934	22,758	1,084	21,674	11.4	88.6
Gogebic County	16,427	5,229	—	5,229	11,198	4,830	6,368	31.8	68.2
Grand Traverse County	86,986	45,212	—	45,212	41,774	2,537	39,237	52.0	48.0
Gratiot County	42,476	16,924	—	16,924	25,552	5,957	19,595	39.8	60.2
Hillsdale County	46,688	14,414	—	14,414	32,274	4,864	27,410	30.9	69.1
Houghton County	36,628	22,777	—	22,777	13,851	1,857	11,994	62.2	37.8
Huron County	33,118	3,490	—	3,490	29,628	9,240	20,388	10.5	89.5
Ingham County	280,895	243,799	237,482	6,317	37,096	4,751	32,345	86.8	13.2
Ionia County	63,905	25,218	—	25,218	38,687	6,016	32,671	39.5	60.5
Iosco County	25,887	10,638	—	10,638	15,249	2,720	12,529	41.1	58.9
Iron County	11,817	3,208	—	3,208	8,609	2,985	5,624	27.1	72.9
Isabella County	70,311	37,554	—	37,554	32,757	5,106	27,651	53.4	46.6
Jackson County	160,248	93,227	90,057	3,170	67,021	7,389	59,632	58.2	41.8
Kalamazoo County	250,331	206,405	206,405	—	43,926	2,996	40,930	82.5	17.5
Kalkaska County	17,153	2,668	—	2,668	14,485	2,799	11,686	15.6	84.4
Kent County	602,622	508,159	493,736	14,423	94,463	10,252	84,211	84.3	15.7
Keweenaw County	2,156	—	—	—	2,156	401	1,755	—	100.0
Lake County	11,539	—	—	—	11,539	1,526	10,013	—	100.0
Lapeer County	88,319	20,006	71	19,935	68,313	6,108	62,205	22.7	77.3
Leelanau County	21,708	1,897	—	1,897	19,811	3,223	16,588	8.7	91.3
LeNawee County	99,892	48,126	—	48,126	51,766	11,060	40,706	48.2	51.8
Livingston County	180,967	114,181	110,387	3,794	66,786	163	66,623	63.1	36.9
Luce County	6,631	3,225	—	3,225	3,406	24	3,382	48.6	51.4
Mackinac County	11,113	2,531	—	2,531	8,582	589	7,993	22.8	77.2
Macomb County	840,978	817,386	811,250	6,136	23,592	2,566	21,026	97.2	2.8
Manistee County	24,733	9,606	—	9,606	15,127	2,972	12,155	38.8	61.2
Marquette County	67,077	39,247	—	39,247	27,830	8,359	19,471	58.5	41.5
Mason County	28,705	10,710	—	10,710	17,995	1,919	16,076	37.3	62.7
Mecosta County	42,798	14,241	—	14,241	28,557	4,380	24,177	33.3	66.7
Menominee County	24,029	8,570	—	8,570	15,459	1,945	13,514	35.7	64.3
Midland County	83,629	47,852	47,852	—	35,777	1,699	34,078	57.2	42.8
Missaukee County	14,849	—	—	—	14,849	1,756	13,093	—	100.0
Monroe County	152,021	94,928	88,967	5,961	57,093	4,716	52,377	62.4	37.6
Montcalm County	63,342	9,743	—	9,743	53,599	7,666	45,933	15.4	84.6
Montmorency County	9,765	—	—	—	9,765	3,220	6,545	—	100.0
Muskegon County	172,188	132,043	121,605	10,438	40,145	2,721	37,424	76.7	23.3
Newaygo County	48,460	7,831	—	7,831	40,629	2,960	37,669	16.2	83.8
Oakland County	1,202,362	1,144,809	1,133,560	11,249	57,553	655	56,898	95.2	4.8
Oceana County	26,570	2,686	—	2,686	23,884	4,703	19,181	10.1	89.9
Ogemaw County	21,699	—	—	—	21,699	6,798	14,901	—	100.0
Ontonagon County	6,780	—	—	—	6,780	1,968	4,812	—	100.0
Osceola County	23,528	—	—	—	23,528	6,036	17,492	—	100.0
Oscoda County	8,640	—	—	—	8,640	1,826	6,814	—	100.0
Otsego County	24,164	8,298	—	8,298	15,866	1,005	14,861	34.3	65.7
Ottawa County	263,801	210,208	206,257	3,951	53,593	3,239	50,354	79.7	20.3
Presque Isle County	13,376	2,560	—	2,560	10,816	2,187	8,629	19.1	80.9
Roscommon County	24,449	8,300	—	8,300	16,149	4,592	11,557	33.9	66.1

EXHIBIT C

Table 8.

Population and Housing Units: 1990 to 2010; and Area Measurements and Density: 2010—Con.

(For information concerning historical counts and geographic change, see "User Notes." For information on confidentiality, nonsampling error, and definitions, see Appendixes)

State County/County Equivalent County Subdivision Place	Population			Housing units			Area measurements in square miles		Average per square mile of land	
	2010	2000	1990	2010	2000	1990	Total area	Land area	Population density	Housing unit density
Michigan—Con.										
Chippewa County	38,520	38,543	34,604	21,253	19,430	18,023	2,698.39	1,558.42	24.7	13.6
Bay Mills township	1,477	1,214	787	1,138	996	736	97.94	64.72	22.8	17.6
Bruce township	2,128	1,940	1,610	1,106	986	951	90.65	86.98	24.5	12.7
Chippewa township	213	238	279	313	273	349	95.45	94.84	2.2	3.3
Dafer township	1,263	1,304	1,083	566	545	433	47.93	47.80	26.4	11.8
Detour township	807	894	806	899	851	816	75.44	48.77	16.5	18.4
De Tour Village village	325	421	407	307	307	292	8.38	3.54	91.8	86.7
Drummond township	1,058	992	835	1,670	1,476	1,462	248.99	128.91	8.2	13.0
Hulbert township	168	211	208	256	224	201	71.82	70.85	2.4	3.6
Kinross charter township	7,561	8,140	6,566	1,527	1,519	1,465	120.93	119.72	63.2	12.8
Pickford township	1,595	1,584	1,360	908	776	751	119.52	108.26	14.7	8.4
Raber township	647	670	569	687	602	697	143.09	97.81	6.6	7.0
Rudyard township	1,370	1,315	1,270	731	671	563	90.05	89.64	15.3	8.2
Sault Ste. Marie city	14,144	14,324	14,689	6,534	6,237	6,013	20.16	14.77	957.6	442.4
Soo township	3,141	2,652	2,165	1,563	1,297	1,073	67.93	50.13	62.7	31.2
Sugar Island township	652	683	441	722	652	648	76.46	49.35	13.2	14.6
Superior township	1,337	1,329	990	803	759	588	104.67	102.98	13.0	7.8
Trout Lake township	384	465	429	514	479	401	143.63	141.39	2.7	3.6
Whitefish township	575	588	517	1,316	1,087	876	293.64	241.50	2.4	5.4
Clare County	30,926	31,252	24,952	23,233	22,229	19,135	575.34	564.32	54.8	41.2
Arthur township	647	667	544	325	330	274	36.21	36.02	18.0	9.0
Clare city (part)	3,071	3,140	3,013	1,513	1,467	1,336	2.95	2.84	1,081.3	532.7
Franklin township	825	809	600	988	915	732	35.47	35.33	23.4	28.0
Freeman township	1,157	1,118	613	1,052	933	605	35.80	34.58	33.5	30.4
Frost township	1,047	1,159	826	1,242	1,190	1,048	35.52	34.95	30.0	35.5
Garfield township	1,882	1,968	1,477	1,954	1,936	1,685	35.77	33.39	56.4	58.5
Grant township	3,259	3,034	2,636	1,520	1,367	1,179	33.25	32.76	99.5	46.4
Greenwood township	1,041	1,059	718	913	861	689	35.50	35.20	29.6	25.9
Hamilton township	1,829	1,988	1,546	1,628	1,650	1,429	36.36	35.87	51.0	45.4
Harrison city	2,114	2,108	1,835	1,306	1,187	1,127	4.03	3.72	568.3	351.1
Hatton township	933	923	673	490	466	343	36.14	35.89	26.0	13.7
Hayes township	4,675	4,916	3,811	3,999	3,898	3,596	32.17	31.28	149.5	127.8
Lincoln township	1,824	1,758	1,253	2,081	1,949	1,589	35.93	35.08	52.0	59.3
Redding township	526	526	448	532	497	428	35.43	34.90	15.1	15.2
Sheridan township	1,575	1,588	1,051	608	569	407	36.50	36.15	43.6	16.8
Summerfield township	456	453	316	613	639	558	35.90	35.20	13.0	17.4
Surrey township	3,606	3,555	3,221	2,084	1,989	1,771	35.81	35.10	102.7	59.4
Farwell village	871	855	851	411	404	363	1.40	1.35	645.2	304.4
Winterfield township	459	483	371	385	386	339	36.61	36.05	12.7	10.7
Clinton County	75,382	64,753	57,893	30,695	24,630	20,967	574.56	566.41	133.1	54.2
Bath charter township	11,598	7,541	6,387	5,106	2,931	2,396	35.03	31.83	364.4	160.4
Bath CDP	2,083	(X)	(X)	808	(X)	(X)	5.94	5.74	362.9	140.8
Bengal township	1,188	1,174	989	421	384	313	36.54	36.53	32.5	11.5
Bingham township	2,859	2,517	2,438	1,074	905	838	32.41	32.39	88.3	33.2
Dallas township	2,369	2,323	2,156	873	804	674	36.51	36.39	65.1	24.0
Fowler village	1,208	1,136	937	488	446	351	1.35	1.32	915.2	369.7
DeWitt city	4,507	4,702	3,964	1,808	1,661	1,347	2.98	2.86	1,575.9	632.2
DeWitt charter township	14,321	12,143	10,448	6,061	5,119	4,192	31.27	31.03	461.5	195.3
Duplain township	2,363	2,329	2,235	953	900	820	35.41	35.12	67.3	27.1
Elsie village	966	1,055	957	421	438	378	1.20	1.16	832.8	362.9
Eagle township	2,671	2,343	2,151	1,058	874	746	35.38	34.74	76.9	30.5
Eagle village	123	130	120	50	47	42	0.12	0.12	1,025.0	416.7
East Lansing city (part)	1,969	34	(X)	817	7	(X)	3.56	3.56	553.1	229.5
Essex township	1,910	1,812	1,677	749	659	585	35.60	35.36	54.0	21.2
Maple Rapids village	672	643	680	277	262	263	1.42	1.36	494.1	203.7
Grand Ledge city (part)	2	—	(X)	2	—	(X)	0.32	0.32	6.3	6.3
Greenbush township	2,199	2,115	2,028	857	759	662	35.45	35.18	62.5	24.4
Lebanon township	605	705	644	237	225	207	35.40	35.10	17.2	6.8
Hubbardston village (part)	44	42	19	16	13	8	0.48	0.48	91.7	33.3
Olive township	2,476	2,322	2,122	968	844	764	35.82	35.63	69.5	27.2
Ovid township	3,795	3,490	3,105	1,442	1,279	1,142	35.99	35.84	105.9	40.2
Ovid village (part)	1,597	1,512	1,442	616	603	570	0.92	0.92	1,735.9	669.6
Riley township	2,024	1,767	1,543	755	625	509	35.73	35.71	56.7	21.1
St. Johns city	7,865	7,744	7,392	3,451	3,197	2,870	3.87	3.87	2,032.3	891.7
Victor township	3,460	3,275	2,784	1,331	1,166	936	35.96	33.93	102.0	39.2
Lake Victoria CDP	930	(X)	(X)	361	(X)	(X)	1.05	0.82	1,134.1	440.2
Watertown charter township	4,836	4,160	3,731	1,877	1,501	1,286	35.72	35.51	136.2	52.9
Wacousta CDP	1,440	(X)	(X)	599	(X)	(X)	8.99	8.91	161.6	67.2
Westphalia township	2,365	2,257	2,099	855	790	680	35.59	35.52	66.6	24.1
Westphalia village	923	876	780	364	350	294	1.14	1.11	831.5	327.9

EXHIBIT D

Table 8.

Population and Housing Units: 1990 to 2010; and Area Measurements and Density: 2010—Con.

[For information concerning historical counts and geographic change, see "User Notes." For information on confidentiality, nonsampling error, and definitions, see Appendixes.]

State County/County Equivalent County Subdivision Place	Population			Housing units			Area measurements in square miles		Average per square mile of land	
	2010	2000	1990	2010	2000	1990	Total area	Land area	Population density	Housing unit density
Michigan—Con.										
Genesee County—Con.										
Mundy township	15,082	12,191	11,536	6,508	5,047	4,318	36.18	36.03	418.6	180.6
Richfield township	8,730	8,170	7,271	3,429	3,125	2,511	36.37	35.06	249.0	97.8
Swartz Creek city	5,758	5,102	4,851	2,749	2,355	1,981	4.05	4.04	1,425.2	680.4
Thetford township	7,049	8,277	8,333	2,994	3,072	2,909	34.66	34.55	204.0	86.7
Vienna charter township	13,255	13,108	13,210	5,571	5,199	4,762	35.12	35.01	378.6	159.1
Gladwin County										
Beaverton city	25,692	26,023	21,896	17,672	16,828	14,885	515.93	501.78	51.2	35.2
Beaverton township	1,071	1,106	1,150	537	546	539	1.31	1.03	1,039.8	521.4
Bentley township	1,964	1,815	1,671	912	750	640	35.33	35.03	56.1	26.0
Billings township	844	859	751	382	361	290	35.80	34.70	24.3	11.0
Bourret township	2,416	2,715	2,305	2,109	2,148	2,024	23.19	21.56	112.1	97.8
Buckeye township	461	471	400	530	516	486	32.73	32.34	14.3	16.4
Butman township	1,308	1,333	996	676	645	531	34.56	34.17	38.3	19.8
Clement township	1,999	1,947	1,188	1,734	1,482	992	35.64	34.00	58.8	51.0
Gladwin city	901	994	822	1,168	1,186	1,130	20.85	20.04	45.0	58.3
Gladwin township	2,933	3,001	2,682	1,421	1,329	1,185	2.92	2.89	1,014.9	491.7
Grim township	1,116	1,044	916	493	419	397	35.29	35.22	31.7	14.0
Grout township	136	129	100	112	123	107	71.32	70.30	1.9	1.6
Hay township	1,964	1,869	1,626	840	754	641	34.79	34.18	57.5	24.6
Sage township	1,362	1,402	1,173	1,315	1,321	1,197	22.69	21.45	63.5	61.3
Secord township	2,457	2,617	2,177	1,569	1,526	1,389	35.43	34.23	71.8	45.8
Sherman township	1,151	1,140	914	1,399	1,373	1,242	23.51	22.03	52.2	63.5
Tobacco township	1,043	1,029	796	961	950	874	35.34	34.87	29.9	27.6
Gogebic County	2,566	2,552	2,229	1,514	1,399	1,221	35.22	33.75	76.0	44.9
Bessemer city	16,427	17,370	18,052	10,795	10,839	10,997	1,476.34	1,101.85	14.9	9.8
Bessemer township	1,905	2,148	2,272	1,140	1,179	1,205	5.47	5.47	348.3	208.4
Erwin township	1,176	1,270	1,374	857	946	945	115.29	113.73	10.3	7.5
Ironwood city	326	357	477	206	258	258	48.35	47.45	6.9	4.3
Ironwood charter township	5,387	6,293	6,849	3,175	3,349	3,410	6.42	6.42	839.1	494.5
Marenisco township	2,333	2,330	2,303	1,708	1,609	1,618	188.93	175.40	13.3	9.7
Marenisco CDP	1,727	1,051	959	683	663	687	325.90	310.89	5.6	2.2
Wakefield city	254	(X)	(X)	170	(X)	(X)	3.45	3.45	73.6	49.3
Wakefield township	1,851	2,085	2,318	994	1,035	1,053	8.58	8.02	230.8	123.9
Watersmeet township	305	364	452	369	376	440	180.49	179.70	1.7	2.1
Watersmeet CDP	1,417	1,472	1,048	1,663	1,466	1,381	277.77	254.77	5.6	6.5
Grand Traverse County	428	(X)	(X)	252	(X)	(X)	9.21	9.20	46.5	27.4
Acme township	86,986	77,654	64,273	41,599	34,842	28,740	601.31	464.33	187.3	89.6
Blair township	4,375	4,332	3,447	2,399	2,215	1,587	25.28	25.01	174.9	95.9
Chums Corner CDP	8,209	6,448	5,249	3,176	2,482	1,956	35.98	35.61	230.5	89.2
Grawn CDP	946	(X)	(X)	377	(X)	(X)	2.66	2.66	355.6	141.7
East Bay township	772	(X)	(X)	320	(X)	(X)	0.63	0.63	1,225.4	507.9
Fife Lake township	10,663	9,919	8,307	5,227	4,339	3,770	42.39	39.93	267.0	130.9
Fife Lake village	2,791	1,517	1,344	855	779	698	35.97	34.60	80.7	24.7
Garfield charter township	443	466	394	265	256	225	1.20	0.75	590.7	353.3
Grant township	16,256	13,840	10,516	8,194	6,150	4,513	27.69	26.59	611.4	308.2
Green Lake township	1,066	947	745	552	467	382	36.02	35.20	30.3	15.7
Interlochen CDP	5,784	5,009	3,677	2,958	2,457	2,107	36.40	29.18	198.2	101.4
Long Lake township	583	(X)	(X)	277	(X)	(X)	1.27	1.24	470.2	223.4
Mayfield township	8,662	7,648	5,977	3,926	3,210	2,621	35.67	29.90	289.7	131.3
Paradise township	1,550	1,271	967	618	480	375	36.05	35.92	43.2	17.2
Kingsley village	4,713	4,191	2,508	1,796	1,481	912	52.98	52.87	89.1	34.0
Peninsula township	1,480	1,469	738	568	524	269	1.44	1.42	1,042.3	400.0
Traverse City city (part)	5,433	5,265	4,340	3,032	2,613	2,206	31.91	27.89	194.8	108.7
Union township	14,482	14,383	15,116	7,260	6,771	6,531	8.31	7.98	1,814.8	909.8
Whitewater township	405	417	255	239	222	167	36.01	35.81	11.3	6.7
Whitewater CDP	2,597	2,467	1,825	1,367	1,176	915	53.56	47.84	54.3	28.6
Gratiot County										
Alma city	42,476	42,285	38,982	16,339	15,516	14,699	571.61	568.46	74.7	28.7
Arcada township	9,383	9,275	9,034	3,784	3,476	3,307	6.09	5.93	1,582.3	638.1
Bethany township	1,681	1,708	1,660	722	693	620	32.46	32.17	52.3	22.4
Elba township	1,407	2,533	1,333	561	543	510	34.70	34.57	40.7	16.2
Ashley village	1,396	1,394	1,390	574	557	530	35.08	34.99	39.9	16.4
Emerson township	563	526	518	221	206	185	0.64	0.64	879.7	345.3
Emerson CDP	952	966	1,003	390	383	388	34.30	34.29	27.8	11.4

EXHIBIT E

470

Schools and Libraries Universal Service Description of Services Requested and Certification Form

Estimated Average Burden Hours Per Response: 4.0 hours

This form is designed to help you describe the eligible telecommunications-related services you seek so that this data can be posted on the Fund Administrator website and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before beginning this application.

(To be completed by entity that will negotiate with providers.)

Block 1: Applicant Address and Identifications

Form 470 Application Number: 635920000418193

Applicant's Form Identifier: Internet

Application Status: CERTIFIED

Posting Date: 10/07/2002

Allowable Contract Date: 11/04/2002

Certification Received Date: 10/18/2002

1. Name of Applicant:

CLARE-GLADWIN RESD

2. Funding Year:

07/01/2003 - 06/30/2004

3. Your Entity Number

131099

4a. Applicant's Street Address, P.O.Box, or Route Number

4041 E MANNSIDING RD

City

CLARE

State

MI

Zip Code

48617 - 9753

b. Telephone number

ext.

(989) 386- 3851

c. Fax number

(989) 386- 3238

d. E-mail Address

kchinavare@cgresd.net

5. Type Of Applicant



Individual School (individual public or non-public school)



School District (LEA; public or non-public [e.g., diocesan] local district representing multiple schools)



Library (including library system, library branch, or library consortium applying as a library)



Consortium (intermediate service agencies, states, state networks, special consortia)

6a. Contact Person's Name: Ken Chinavare

*First, fill in every item of the Contact Person's information below that is different from Item 4, above. Then check the box next to the preferred mode of contact. (At least one box **MUST** be checked.)*

6b. Street Address, P.O.Box, or Route Number

4041 E MANNSIDING RD

City

CLARE

State

MI

Zip Code

48617 - 9753



6c. Telephone Number (989) 386- 3851



6d. Fax Number (989) 386- 3238

6e. E-mail Address **kchinavare@cgresd.net****Block 2: Summary Description of Needs or Services Requested****7 This Form 470 describes (check all that apply):**

- a. ☐ Tariffed services - telecommunications services, purchased at regulated prices, for which the applicant has no signed, written contract. A new Form 470 must be filed for tariffed services for each funding year.
- b. ☐ Month-to-month services for which the applicant has no signed, written contract. A new Form 470 must be filed for these services for each funding year.
- c. ☐ Services for which a new written contract is sought for the funding year in Item 2.
- d. ☐ A multi-year contract signed on or before 7/10/97 but for which no Form 470 has been filed in a previous program year.

NOTE: Services that are covered by a signed, written contract executed pursuant to posting of a Form 470 in a previous program year OR a contract signed on/before 7/10/97 and reported on a Form 470 in a previous year as an existing contract do NOT require filing of a Form 470.

What kinds of service are you seeking: Telecommunications Services, Internet Access, or Internal Connections? Refer to the Eligible Services List at www.sl.universalservice.org for examples. Check the relevant category or categories (8, 9, and/or 10 below), and answer the questions in each category you select.

8 ☐ Telecommunications Services

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a ☒ YES, I have an RFP. It is available on the Web at usf.crystalauto.com/cgresd.htm or via (check one):
☐ the Contact Person in Item 6 or ☐ the contact listed in Item 11.

- b ☒ NO , I do not have an RFP for these services.

If you answered NO, you must list below the Telecommunications Services you seek. Specify each **service or function** (e.g., local voice service) and quantity and/or capacity(e.g., 20 existing lines plus 10 new ones). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Telecommunications Services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism. Add additional lines if needed.

9 ☐ Internet Access

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a ☒ YES, I have an RFP. It is available on the Web at usf.crystalauto.com/cgresd.htm or via (check one):
☐ the Contact Person in Item 6 or ☐ the contact listed in Item 11.

- b ☒ NO , I do not have an RFP for these services.

If you answered NO, you must list below the Internet Access Services you seek. Specify each **service or function** (e.g., monthly Internet service) and quantity and/or capacity(e.g., for 500 users). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internet Access services. Add additional lines if needed.

10 ☐ Internal Connections

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a ☒ YES, I have an RFP. It is available on the Web at or via (check one):
☐ the Contact Person in Item 6 or ☐ the contact listed in Item 11.

- b ☒ NO , I do not have an RFP for these services.

If you answered NO, you must list below the Internal Connections Services you seek. Specify each **service or function** (e.g., local area network) and quantity and/or capacity (e.g., connecting 10 rooms and 300 computers at 56kbps or better). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internal Connections services. Add additional lines if needed.

11 (Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This need not be the contact person listed in Item 6 nor the signer of this form.

Name:	Title:
Telephone number () -	
Fax number () -	
E-mail Address	

12. ☐ Check here if there are any restrictions imposed by state or local laws or regulations on how or when providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures, and/or provide Web address where they are posted and a contact name and telephone number for service providers without Internet access.

13. If you intend to enter into a multi-year contract based on this posting or a contract featuring an option for voluntary extensions you may provide that information below. If you have plans to purchase additional services in future years, or expect to seek new contracts for existing services, summarize below (including the likely timeframes).

Block 3: Technology Assessment

14. ☐ **Basic telephone service only:** If your application is for basic local and long distance telephone service (wireline or wireless) only, check this box and skip to Item 16.

15. Although the following services and facilities are ineligible for support, they are usually necessary to make effective use of the eligible services requested in this application. Unless you indicated in Item 14 that your application is ONLY for basic telephone service, you must check at least one box in (a) through (e). You may provide details for purchases being sought.

a. Desktop communications software: Software required ☒ has been purchased; and/or ☐ is being sought.

b. Electrical systems: ☒ adequate electrical capacity is in place or has already been arranged; and/or ☐ upgrading for additional electrical capacity is being sought.

c. Computers: a sufficient quantity of computers ☒ has been purchased; and/or ☐ is being sought.

d. Computer hardware maintenance: adequate arrangements ☒ have been made; and/or ☐ are being sought.

e. Staff development: ☒ all staff have had an appropriate level of training /additional training has already been scheduled; and/or ☐ training is being sought.

f. Additional details: Use this space to provide additional details to help providers to identify the services you desire.

Block 4: Recipients of Service

16. Eligible Entities That Will Receive Services:

Check the ONE choice (a,b or c) that best describes this application and the eligible entities that will receive the services described in this application. You will then list in Item 17 the entity/entities that will pay the bills for these services.

a. ☒ Individual school or single-site library.

b. ☒ Statewide application for (enter 2-letter state code) representing (check all that apply):

☐ All public schools/districts in the state:

☐ All non-public schools in the state:

☐ All libraries in the state:

If your statewide application includes INELIGIBLE entities, check here. ☐ If checked, complete Item 18.

c. ☒ School district, library system, or consortium application to serve multiple eligible entities:

Number of eligible entities	32
<i>For these eligible sites, please provide the following</i>	
Area Codes (list each unique area code)	Prefixes associated with each area code (first 3 digits of phone number) separate with commas, leave no spaces
989	246
989	386
989	426
989	435
989	539
989	588
If your application includes INELIGIBLE entities, check here. <input type="checkbox"/> If checked, complete Item 18.	

17. Billed Entities

List the entity/entities that will be paying the bills directly to the provider for the services requested in this application. These are known as Billed Entities. At least one line of this item must be completed. Attach additional sheets if necessary.

Entity Number	Entity
131099	CLARE-GLADWIN RESD

18. Ineligible Participating Entities

Does your application also seek bids on services to entities that are not eligible for the Universal Service Program? If so, list those entities here (attach pages if needed):

Ineligible Participating Entity	Area Code	Prefix
---------------------------------	-----------	--------

Block 5: Certification

19. The applicant includes:(Check one or both)

- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to elementary and secondary schools, colleges and universities).

20. All of the individual schools, libraries, and library consortia receiving services under this application are covered by:

- a. ☒ individual technology plans for using the services requested in the application, and/or
- b. ☐ higher-level technology plans for using the services requested in the application, or
- c. ☐ no technology plan needed; application requests basic local and/or long distance telephone service only.

21. Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):

- a. ☒ technology plan(s) has/have been approved by a state or other authorized body.
- b. ☐ technology plan(s) will be approved by a state or other authorized body.
- c. ☐ no technology plan needed; application requests basic local and long distance telephone service only. .

22. ☒ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

23. ☒ I recognize that support under this support mechanism is conditional upon the school(s) or library(ies) I represent securing access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to use the services purchased effectively.

24. ☒ I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

25. Signature of authorized person: ☒

26. Date (mm/dd/yyyy): **10/08/2002**

27. Printed name of authorized person: **Ken Chinavare**

28. Title or position of authorized person: **Technology Coordinator**

29a. Address of authorized person:

City: State: Zip:

29b. Telephone number of authorized person: **(989) 386 - 3851**

29c. Fax number of authorized person: **()**

29d. E-mail address number of authorized person:

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

Service provider involvement with preparation or certification of a Form 470 can taint the competitive bidding process and result in the denial of funding requests. For more information, refer to the "Service Provider Role in Assisting Customers" at www.sl.universalservice.org/vendor/manual/chapter5.doc or call the Client Service Bureau at 1-888-203-8100.

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

Please submit this form to:

**SLD-Form 470
P.O. Box 7026
Lawrence, Kansas 66044-7026
1-888-203-8100**

For express delivery services or U.S. Postal Service, Return Receipt Requested, mail this form to:

SLD-Form 470
c/o Ms. Smith
3833 Greenway Drive
Lawrence, Kansas 66046
1-888-203-8100

FCC Form 470
April 2002

[New Search](#)

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EXHIBIT F



Crystal Automation Systems, Inc

617 E. Lake Street, Stanton, MI 48888-8902
Telephone 989-831-8800 Fax 989-831-5555
[http:// www.crystalauto.com](http://www.crystalauto.com)

Quotation

Attn: Ken Chinavare
For: Clare - Gladwin RESD
4041 E. Mannsiding Rd..
Clare, MI 48617

Quote No. 2163
Date: November 15, 2002
Page: 1
Ticket: 7422

Quantity	Description	Unit Cost	Total
	For: USF Funded Entire RESD Internet Access Form 470 Application Number: 63592000018193 Applicant's Form Identifier: Internet Effective Date 7-1-2003 to 6-30-2004 CAS Spin# 143-004-346 Description: 28 Tier-One 1.544Mbit(T1) Internet connections servicing 9 school districts of 17500 students and faculty. Email services with POP3, IMAP4 and web for all students and faculty. Connections are one hop away from Qwest's OC192 Internet backbone. School connections are heavy use connections. All Board offices included at no additional fee All telco fees included All end to end support included to maintain Internet connectivity as allowed by SLD.		
12	Clare Gladwin RESD Harrison, Day School	4550	54600
12	Beaverton Rural Schools Alternative Education, Primary School, Elementary School, Middle School, High School, BoardOffice(N/C)	11375	136500
12	Clare Public Schools High School, Middle School, Primary School, BoardOffice(N/C)	6825	81900
12	Farwell Area Schools Elementary, Middle School, High School, BoardOffice(N/C)	6825	81900
12	Gladwin Community Schools Elementary, Intermediate, Jr High, High School, BoardOffice(N/C)	9100	109200
12	Harrison Community Schools Community Education, Charles A. Amble Elementary, HillSide Elementary, Robert M. Larson Elementary, Middle School, High School, BoardOffice(N/C)	13650	163800
	Total		\$627,900.00

Price Subject to Applicable Sales Tax

Delivery: July 1, 2003

Terms: Standard Educational / SLD Partial Payment

FOB: Crystal Automation Systems, Inc.

By: 
Steven R. Meinhardt, President

Crystal Automation Systems

617 E. Lake St., Stanton, MI 48888-8902 Telephone (517) 831-8800 Fax (517) 831-5555 [http:// www.crystalauto.com](http://www.crystalauto.com)

Clare-Gladwin RESD Internet Purchase Order Language

For your consideration, you may use the following language on your purchase order for Internet Access for 2003-04:

Description: **Internet Access – July 1, 2003-June 30, 2004 as per Quote 2163 (Nov. 15, 2002)
Billing Account/Contract #CAS-Q2163**

Includes:	28	1.544 Mbit Internet access bandwidth servicing 6 school districts with approximately 12,000 students and staff. Clare-Gladwin RESD Beaverton Rural Schools Clare Public Schools Farwell Area Schools Gladwin Community Schools Harrison Community Schools Monthly Internet Access Fee	12	Total Annual Cost	\$627,864.96
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NOTES:

1. This contract is based upon Universal Service Funding.
 - a. SLD Form 471 Application # 369768
 - b. FRN #1008159
 - c. Discount: 73%
2. CGRESO to pay \$169,523.54 in quarterly payments of \$42,380.89.
3. Crystal Automation Systems, Inc. to invoice SLD/USF for balance (\$458,341.42) based upon Funding Commitment Decision Letter.

EXHIBIT G

**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Refresh Page

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Block 1: Billed Entity Information

Applicant's Form Identifier: Internet
471 Application Number: 348182

Funding Year: 07/01/2003 - 06/30/2004**Billed Entity Number:** 131099

Name: CLARE-GLADWIN RESD
Address: 4041 E MANNSIDING RD
City: CLARE **State:** MI **Zip:** 48617 9753

Contact Name: Ken Chinavare
Address: 4041 E MANNSIDING RD
City: CLARE **State:** MI **Zip:** 48617 9753

Type of Application: CONSORTIUM**Ineligible Orgs:** N**Block 3: Impact of Services Ordered in THIS Application****Number of students to be served:** 12000**Number of library patrons to be served:**

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
f. Direct connections to the Internet: How many before and after your order?	1	6
g. Direct connections to the Internet: Highest speed before and after your order?	4.5mb	9.0mb
h. Internet access(for schools): How many rooms have Internet access before and after your order?	600	650
i. Internet Access: How many computers (or other devices) with Internet access before and after your order?	1500	2000

Block 4: Worksheets**Worksheet C No:** 441331**Entity Count:** 6**Sum. Discount (Sum. Column 3):** 436%**Shared Discount:** 73%**1. School District Name:** BEAVERTON RURAL SCHOOL DIST**2. Entity Number:** 131092**Prep. Worksheet No:** [441470](#)**3. Discount:** 66%**1. School District Name:** CLARE PUBLIC SCHOOL DISTRICT**2. Entity Number:** 131097**Prep. Worksheet No:** [441475](#)**3. Discount:** 66%**1. School District Name:** CLARE-GLADWIN RESD**2. Entity Number:** 131099**Prep. Worksheet No:** [441487](#)**3. Discount:** 80%

1. School District Name: FARWELL AREA SCHOOL DISTRICT
 2. Entity Number: 131103 Prep. Worksheet No: [441332](#) 3. Discount: 77%

1. School District Name: GLADWIN COMMUNITY SCHOOLS
 2. Entity Number: 131106 Prep. Worksheet No: [441337](#) 3. Discount: 67%

1. School District Name: HARRISON COMM SCHOOL DISTRICT
 2. Entity Number: 131109 Prep. Worksheet No: [441478](#) 3. Discount: 80%

Prep. Worksheet A No: 441332 Student Count: 1667
 School District Name: FARWELL AREA SCHOOL DISTRICT
 Entity Number: 131103
 Weighted Product (Sum. Column 8): 1277.8 Shared Discount: 77%

1. School Name: FARWELL ELEMENTARY SCHOOL
 2. Entity Number: 56139 3. Rural/Urban: Rural
 4. Student Count: 599 5. NSLP Students: 388 6. NSLP Students/Students: 64.774%
 7. Discount: 80% 8. Weighted Product: 479.2

1. School Name: FARWELL MIDDLE SCHOOL
 2. Entity Number: 56140 3. Rural/Urban: Rural
 4. Student Count: 510 5. NSLP Students: 319 6. NSLP Students/Students: 62.549%
 7. Discount: 80% 8. Weighted Product: 408

1. School Name: FARWELL SR HIGH SCHOOL
 2. Entity Number: 56141 3. Rural/Urban: Rural
 4. Student Count: 558 5. NSLP Students: 244 6. NSLP Students/Students: 43.727%
 7. Discount: 70% 8. Weighted Product: 390.6

Prep. Worksheet A No: 441337 Student Count: 1988
 School District Name: GLADWIN COMMUNITY SCHOOLS
 Entity Number: 131106
 Weighted Product (Sum. Column 8): 1332.3 Shared Discount: 67%

1. School Name: GLADWIN COMMUNITY ALT HIGH SCH
 2. Entity Number: 183371 3. Rural/Urban: Rural
 4. Student Count: 24 5. NSLP Students: 22 6. NSLP Students/Students: 91.666%
 7. Discount: 90% 8. Weighted Product: 21.6

1. School Name: GLADWIN ELEMENTARY SCHOOL
 2. Entity Number: 56147 3. Rural/Urban: Rural
 4. Student Count: 371 5. NSLP Students: 169 6. NSLP Students/Students: 45.552%
 7. Discount: 70% 8. Weighted Product: 259.7

1. School Name: GLADWIN INTERMEDIATE SCHOOL
 2. Entity Number: 56145 3. Rural/Urban: Rural
 4. Student Count: 432 5. NSLP Students: 191 6. NSLP Students/Students: 44.212%
 7. Discount: 70% 8. Weighted Product: 302.4

1. School Name: GLADWIN JR HIGH SCHOOL
 2. Entity Number: 56148 3. Rural/Urban: Rural
 4. Student Count: 520 5. NSLP Students: 237 6. NSLP Students/Students: 45.576%
 7. Discount: 70% 8. Weighted Product: 364

1. School Name: GLADWIN SR HIGH SCHOOL
 2. Entity Number: 56146 3. Rural/Urban: Rural
 4. Student Count: 641 5. NSLP Students: 160 6. NSLP Students/Students: 24.961%
 7. Discount: 60% 8. Weighted Product: 384.6

Prep. Worksheet A No: 441470 Student Count: 1739
 School District Name: BEAVERTON RURAL SCHOOL DIST

Entity Number: 131092

Weighted Product (Sum. Column 8): 1156.4

Shared Discount: 66%

1. School Name: BEAVERTON ELEMENTARY SCHOOL		
2. Entity Number: 56114	3. Rural/Urban: Rural	
4. Student Count: 339	5. NSLP Students: 151	6. NSLP Students/Students: 44.542%
7. Discount: 70%	8. Weighted Product: 237.3	

1. School Name: BEAVERTON JR HIGH SCHOOL		
2. Entity Number: 56115	3. Rural/Urban: Rural	
4. Student Count: 257	5. NSLP Students: 112	6. NSLP Students/Students: 43.579%
7. Discount: 70%	8. Weighted Product: 179.9	

1. School Name: BEAVERTON MIDDLE SCHOOL		
2. Entity Number: 56116	3. Rural/Urban: Rural	
4. Student Count: 534	5. NSLP Students: 225	6. NSLP Students/Students: 42.134%
7. Discount: 70%	8. Weighted Product: 373.8	

1. School Name: BEAVERTON SR HIGH SCHOOL		
2. Entity Number: 56117	3. Rural/Urban: Rural	
4. Student Count: 609	5. NSLP Students: 192	6. NSLP Students/Students: 31.527%
7. Discount: 60%	8. Weighted Product: 365.4	

Prep. Worksheet A No: 441475 Student Count: 1744

School District Name: CLARE PUBLIC SCHOOL DISTRICT

Entity Number: 131097

Weighted Product (Sum. Column 8): 1155.7

Shared Discount: 66%

1. School Name: CLARE MIDDLE SCHOOL		
2. Entity Number: 56131	3. Rural/Urban: Rural	
4. Student Count: 531	5. NSLP Students: 207	6. NSLP Students/Students: 38.983%
7. Discount: 70%	8. Weighted Product: 371.7	

1. School Name: CLARE PRIMARY SCHOOL		
2. Entity Number: 56130	3. Rural/Urban: Rural	
4. Student Count: 562	5. NSLP Students: 244	6. NSLP Students/Students: 43.416%
7. Discount: 70%	8. Weighted Product: 393.4	

1. School Name: CLARE SR HIGH SCHOOL		
2. Entity Number: 56129	3. Rural/Urban: Rural	
4. Student Count: 651	5. NSLP Students: 191	6. NSLP Students/Students: 29.339%
7. Discount: 60%	8. Weighted Product: 390.6	

Prep. Worksheet A No: 441478 Student Count: 2127

School District Name: HARRISON COMM SCHOOL DISTRICT

Entity Number: 131109

Weighted Product (Sum. Column 8): 1692.3

Shared Discount: 80%

1. School Name: AMBLE ELEMENTARY SCHOOL		
2. Entity Number: 56156	3. Rural/Urban: Rural	
4. Student Count: 138	5. NSLP Students: 110	6. NSLP Students/Students: 79.710%
7. Discount: 90%	8. Weighted Product: 124.2	

1. School Name: HARRISON ALTERNATIVE EDUCATION		
2. Entity Number: 202018	3. Rural/Urban: Rural	
4. Student Count: 39	5. NSLP Students: 19	6. NSLP Students/Students: 48.717%
7. Discount: 70%	8. Weighted Product: 27.3	

1. School Name: HARRISON HIGH SCHOOL		
2. Entity Number: 56152	3. Rural/Urban: Rural	
4. Student Count: 650	5. NSLP Students: 249	6. NSLP Students/Students: 38.307%
7. Discount: 70%	8. Weighted Product: 455	

1. School Name: HARRISON MIDDLE SCHOOL
 2. Entity Number: 56153 3. Rural/Urban: Rural
 4. Student Count: 543 5. NSLP Students: 328 6. NSLP Students/Students: 60.405%
 7. Discount: 80% 8. Weighted Product: 434.4

1. School Name: HILLSIDE ELEMENTARY SCHOOL
 2. Entity Number: 56155 3. Rural/Urban: Rural
 4. Student Count: 458 5. NSLP Students: 348 6. NSLP Students/Students: 75.982%
 7. Discount: 90% 8. Weighted Product: 412.2

1. School Name: LARSON ELEMENTARY SCHOOL
 2. Entity Number: 56154 3. Rural/Urban: Rural
 4. Student Count: 299 5. NSLP Students: 151 6. NSLP Students/Students: 50.501%
 7. Discount: 80% 8. Weighted Product: 239.2

Prep. Worksheet A No: 441487 Student Count: 89
 School District Name: CLARE-GLADWIN RESD
 Entity Number: 131099
 Weighted Product (Sum. Column 8): 71.2 Shared Discount: N/A

1. School Name: CLARE GLADWIN DAY SCHOOL
 2. Entity Number: 56133 3. Rural/Urban: Rural
 4. Student Count: 89 5. NSLP Students: 64 6. NSLP Students/Students: 71.910%
 7. Discount: 80% 8. Weighted Product: 71.2

Block 5: Discount Funding Request(s)

FRN: 937555 FCDL Date:	
11. Category of Service: Internet Access	12. 470 Application Number: 635920000418193
13. SPIN: 143004346	14. Service Provider Name: Crystal Automation Systems, Inc.
15. Contract Number: N/A	16. Billing Account Number: CAS-Q????
17. Allowable Contract Date: 11/04/2002	18. Contract Award Date: 12/28/2002
19a. Service Start Date: 07/01/2003	19b. Service End Date:
20. Contract Expiration Date: 06/30/2004	
21. Attachment #: Internet	22. Block 4 Worksheet No.: 441331
23a. Monthly Charges: \$1.00	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$1.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$12.00	
23f. Annual non-recurring (one-time) charges: \$35.00	23g. Ineligible non-recurring amt.: \$35.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$12.00	
23j. % discount (from Block 4): 73	
23k. Funding Commitment Request (23i x 23j): \$8.76	

Block 6: Certifications and Signature

24a. Schools: Y
 24b. Libraries or Library Consortia: N
 26a. Individual Technology Plan: Y
 26b. Higher-Level Technology Plan(s): N
 26c. No Technology Plan Needed:

27a. Approved Technology Plan(s): Y
27b. State Approved Technology Plan: N
27c. No Technology Plan Needed:

36. Printed Name of Authorized Person: Ken Chinavare
37. Title or Position of Authorized Person: Technology Director

Refresh Page

Close Print Preview

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Applicant's Form Identifier:
Contact Person: Ken Chinavare

Entity Number: 131099
Phone Number: (989) 386-3851

Block 6: Certifications and Signature

471 Application Number: 348182

24. The entities listed in Block 4 of this application are eligible for support because they are: (check one or both)

- a. ☐ schools under the statutory definitions of elementary and secondary schools found in the **No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38)**, that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to) elementary and secondary schools, colleges and universities

25. The eligible schools and libraries listed in Block 4 of this application have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.

26. All of the schools and libraries or library consortia listed in Block 4 of this application are covered by:

- a. ☐ an individual technology plan for using the services requested in this application; and/or
- b. ☐ higher-level technology plan(s) for using the services requested in this application; or
- c. ☐ no technology plan needed; applying for basic local distance telephone service only.

27. Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):

- a. ☐ technology plan(s) has/have been approved; and/or
- b. ☐ technology plan(s) will be approved by a state or other authorized body; or
- c. ☐ no technology plan needed; applying for basic local and long distance telephone service only.

28. I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurements of services for which support is being sought.

29. I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

30. I certify that the entity(ies) I represent has complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.

31. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service receive an appropriate share of benefits from those services.

32. I recognize that I may be audited pursuant to this application. I will retain for five years any and all worksheets and other records that I rely upon to fill out this application, and, if audited, will make available to the Administrator such records.

33. I certify that I am authorized to submit this request on behalf of the above-named institution, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

34. Signature of authorized person Cert ID = 21486

35. Date 1/27/2003

36. Printed name of authorized person Ken Chinavare

37. Title or position of authorized person Technology Director

38. Telephone number of authorized person (989) 386-3851

ATTENTION: If you are signing Form 471 using the PIN assigned to you by SLD, you are reminded that using the PIN is equivalent to your handwritten signature on the form. Your use of the PIN to affirm these certifications means that should they prove untrue, you will be held to the same enforcement standards as those who affirm the certifications on paper. Also, by using the PIN, you are affirming that you have the authority to make these certifications and represent the entity featured in Block One of this funding request.

Please Check to affirm your compliance ☒

471 Application Number: 348182

CLARE-GLADWIN RESD

4041 E MANNSIDING RD

CLARE, MI 48617 -9753

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001. The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.

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**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

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Block 1: Billed Entity Information

Applicant's Form Identifier: Internet2
471 Application Number: 350454

Funding Year: 07/01/2003 - 06/30/2004**Billed Entity Number:** 131099

Name: CLARE-GLADWIN RESD
Address: 4041 E MANNSIDING RD
City: CLARE **State:** MI **Zip:** 48617 9753
Phone: 989-386-3851 **Ext:**
Fax: 989-386-3238
E-mail: kchinavare@cgresd.net

Contact Name: Ken Chinavare
Address: 4041 E MANNSIDING RD
City: CLARE **State:** MI **Zip:** 48617 9753
Contact Phone: 989-386-3851 **Ext:**
Contact Fax: 989-386-3238 **Ext:**
E-mail: kchinavare@cgresd.net
Contact Mode: EMAIL
Alternate Contact Info.: Doug Dodge, Superintendent (989-386-3851) ddodge@cgresd.net

Type of Application: CONSORTIUM**Ineligible Orgs:** N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 12000**Number of library patrons to be served:**

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
f. Direct connections to the Internet: How many before and after your order?	1	1
g. Direct connections to the Internet: Highest speed before and after your order?	3.0mb	9.0mb
h. Internet access(for schools): How many rooms have Internet access before and after your order?	600	650
i. Internet Access: How many computers (or other devices) with Internet access before and after your order?	1500	2000

Block 4: Worksheets

Worksheet C No: 445743**Entity Count:** 6**Sum. Discount (Sum. Column 3):** 436%**Shared Discount:** 73%**1. School District Name:** BEAVERTON RURAL SCHOOL DIST**2. Entity Number:** 131092**Prep. Worksheet No:** [445744](#)**3. Discount:** 66%

1. School District Name: CLARE PUBLIC SCHOOL DISTRICT
 2. Entity Number: 131097 Prep. Worksheet No: [445745](#) 3. Discount: 66%

1. School District Name: CLARE-GLADWIN RESD
 2. Entity Number: 131099 Prep. Worksheet No: [445746](#) 3. Discount: 80%

1. School District Name: FARWELL AREA SCHOOL DISTRICT
 2. Entity Number: 131103 Prep. Worksheet No: [445747](#) 3. Discount: 77%

1. School District Name: GLADWIN COMMUNITY SCHOOLS
 2. Entity Number: 131106 Prep. Worksheet No: [445748](#) 3. Discount: 67%

1. School District Name: HARRISON COMM SCHOOL DISTRICT
 2. Entity Number: 131109 Prep. Worksheet No: [445749](#) 3. Discount: 80%

Prep. Worksheet A No: 445744 Student Count: 1739
 School District Name: BEAVERTON RURAL SCHOOL DIST
 Entity Number: 131092
 Weighted Product (Sum. Column 8): 1156.4 Shared Discount: 66%

1. School Name: BEAVERTON ELEMENTARY SCHOOL
 2. Entity Number: 56114 3. Rural/Urban: Rural
 4. Student Count: 339 5. NSLP Students: 151 6. NSLP Students/Students: 44.542%
 7. Discount: 70% 8. Weighted Product: 237.3

1. School Name: BEAVERTON JR HIGH SCHOOL
 2. Entity Number: 56115 3. Rural/Urban: Rural
 4. Student Count: 257 5. NSLP Students: 112 6. NSLP Students/Students: 43.579%
 7. Discount: 70% 8. Weighted Product: 179.9

1. School Name: BEAVERTON MIDDLE SCHOOL
 2. Entity Number: 56116 3. Rural/Urban: Rural
 4. Student Count: 534 5. NSLP Students: 225 6. NSLP Students/Students: 42.134%
 7. Discount: 70% 8. Weighted Product: 373.8

1. School Name: BEAVERTON SR HIGH SCHOOL
 2. Entity Number: 56117 3. Rural/Urban: Rural
 4. Student Count: 609 5. NSLP Students: 192 6. NSLP Students/Students: 31.527%
 7. Discount: 60% 8. Weighted Product: 365.4

Prep. Worksheet A No: 445745 Student Count: 1744
 School District Name: CLARE PUBLIC SCHOOL DISTRICT
 Entity Number: 131097
 Weighted Product (Sum. Column 8): 1155.7 Shared Discount: 66%

1. School Name: CLARE MIDDLE SCHOOL
 2. Entity Number: 56131 3. Rural/Urban: Rural
 4. Student Count: 531 5. NSLP Students: 207 6. NSLP Students/Students: 38.983%
 7. Discount: 70% 8. Weighted Product: 371.7

1. School Name: CLARE PRIMARY SCHOOL
 2. Entity Number: 56130 3. Rural/Urban: Rural
 4. Student Count: 562 5. NSLP Students: 244 6. NSLP Students/Students: 43.416%
 7. Discount: 70% 8. Weighted Product: 393.4

1. School Name: CLARE SR HIGH SCHOOL
 2. Entity Number: 56129 3. Rural/Urban: Rural
 4. Student Count: 651 5. NSLP Students: 191 6. NSLP Students/Students: 29.339%
 7. Discount: 60% 8. Weighted Product: 390.6

Prep. Worksheet A No: 445746 Student Count: 89
 School District Name: CLARE-GLADWIN RESD
 Entity Number: 131099
 Weighted Product (Sum. Column 8): 71.2

Shared Discount: N/A

1. School Name: CLARE GLADWIN DAY SCHOOL		
2. Entity Number: 56133	3. Rural/Urban: Rural	
4. Student Count: 89	5. NSLP Students: 61	6. NSLP Students/Students: 68.539%
7. Discount: 80%	8. Weighted Product: 71.2	

Prep. Worksheet A No: 445747 Student Count: 1667
 School District Name: FARWELL AREA SCHOOL DISTRICT
 Entity Number: 131103
 Weighted Product (Sum. Column 8): 1277.8

Shared Discount: 77%

1. School Name: FARWELL ELEMENTARY SCHOOL		
2. Entity Number: 56139	3. Rural/Urban: Rural	
4. Student Count: 599	5. NSLP Students: 388	6. NSLP Students/Students: 64.774%
7. Discount: 80%	8. Weighted Product: 479.2	

1. School Name: FARWELL MIDDLE SCHOOL		
2. Entity Number: 56140	3. Rural/Urban: Rural	
4. Student Count: 510	5. NSLP Students: 319	6. NSLP Students/Students: 62.549%
7. Discount: 80%	8. Weighted Product: 408	

1. School Name: FARWELL SR HIGH SCHOOL		
2. Entity Number: 56141	3. Rural/Urban: Rural	
4. Student Count: 558	5. NSLP Students: 244	6. NSLP Students/Students: 43.727%
7. Discount: 70%	8. Weighted Product: 390.6	

Prep. Worksheet A No: 445748 Student Count: 1988
 School District Name: GLADWIN COMMUNITY SCHOOLS
 Entity Number: 131106
 Weighted Product (Sum. Column 8): 1332.3

Shared Discount: 67%

1. School Name: GLADWIN COMMUNITY ALT HIGH SCH		
2. Entity Number: 183371	3. Rural/Urban: Rural	
4. Student Count: 24	5. NSLP Students: 22	6. NSLP Students/Students: 91.666%
7. Discount: 90%	8. Weighted Product: 21.6	

1. School Name: GLADWIN ELEMENTARY SCHOOL		
2. Entity Number: 56147	3. Rural/Urban: Rural	
4. Student Count: 371	5. NSLP Students: 169	6. NSLP Students/Students: 45.552%
7. Discount: 70%	8. Weighted Product: 259.7	

1. School Name: GLADWIN INTERMEDIATE SCHOOL		
2. Entity Number: 56145	3. Rural/Urban: Rural	
4. Student Count: 432	5. NSLP Students: 191	6. NSLP Students/Students: 44.212%
7. Discount: 70%	8. Weighted Product: 302.4	

1. School Name: GLADWIN JR HIGH SCHOOL		
2. Entity Number: 56148	3. Rural/Urban: Rural	
4. Student Count: 520	5. NSLP Students: 237	6. NSLP Students/Students: 45.576%
7. Discount: 70%	8. Weighted Product: 364	

1. School Name: GLADWIN SR HIGH SCHOOL		
2. Entity Number: 56146	3. Rural/Urban: Rural	
4. Student Count: 641	5. NSLP Students: 160	6. NSLP Students/Students: 24.961%
7. Discount: 60%	8. Weighted Product: 384.6	

Prep. Worksheet A No: 445749 Student Count: 2127
 School District Name: HARRISON COMM SCHOOL DISTRICT

Entity Number: 131109

Weighted Product (Sum, Column 8): 1692.3

Shared Discount: 80%

1. School Name: AMBLE ELEMENTARY SCHOOL		
2. Entity Number: 56156	3. Rural/Urban: Rural	6. NSLP Students/Students: 79.710%
4. Student Count: 138	5. NSLP Students: 110	
7. Discount: 90%	8. Weighted Product: 124.2	

1. School Name: HARRISON ALTERNATIVE EDUCATION		
2. Entity Number: 202018	3. Rural/Urban: Rural	6. NSLP Students/Students: 48.717%
4. Student Count: 39	5. NSLP Students: 19	
7. Discount: 70%	8. Weighted Product: 27.3	

1. School Name: HARRISON HIGH SCHOOL		
2. Entity Number: 56152	3. Rural/Urban: Rural	6. NSLP Students/Students: 38.307%
4. Student Count: 650	5. NSLP Students: 249	
7. Discount: 70%	8. Weighted Product: 455	

1. School Name: HARRISON MIDDLE SCHOOL		
2. Entity Number: 56153	3. Rural/Urban: Rural	6. NSLP Students/Students: 60.405%
4. Student Count: 543	5. NSLP Students: 328	
7. Discount: 80%	8. Weighted Product: 434.4	

1. School Name: HILLSIDE ELEMENTARY SCHOOL		
2. Entity Number: 56155	3. Rural/Urban: Rural	6. NSLP Students/Students: 75.982%
4. Student Count: 458	5. NSLP Students: 348	
7. Discount: 90%	8. Weighted Product: 412.2	

1. School Name: LARSON ELEMENTARY SCHOOL		
2. Entity Number: 56154	3. Rural/Urban: Rural	6. NSLP Students/Students: 50.501%
4. Student Count: 299	5. NSLP Students: 151	
7. Discount: 80%	8. Weighted Product: 239.2	

Block 5: Discount Funding Request(s)

FRN: 943155 FCDL Date:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 103580000418180
13. SPIN: 143001727	14. Service Provider Name: Ameritech-Michigan (aka Michigan Bell Telephone Co.)
15. Contract Number: T	16. Billing Account Number: 9893863851
17. Allowable Contract Date: 11/04/2002	18. Contract Award Date:
19a. Service Start Date: 07/01/2003	19b. Service End Date: 06/30/2004
20. Contract Expiration Date:	
21. Attachment #: Frame Relay	22. Block 4 Worksheet No.: 445743
23a. Monthly Charges: \$524.00	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$524.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$6,288.00	
23f. Annual non-recurring (one-time) charges: \$0.00	23g. Ineligible non-recurring amt.: \$0.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$6,288.00	
23j. % discount (from Block 4): 73	
23k. Funding Commitment Request (23i x 23j): \$4,590.24	

FRN: 974146 FCDL Date:	
11. Category of Service: Internet Access	12. 470 Application Number: 103580000418180
13. SPIN: 143004346	14. Service Provider Name: Crystal Automation Systems, Inc.

15. Contract Number: N/A	16. Billing Account Number: N/A
17. Allowable Contract Date: 11/04/2002	18. Contract Award Date: 12/28/2002
19a. Service Start Date: 07/01/2003	19b. Service End Date:
20. Contract Expiration Date: 06/30/2004	
21. Attachment #: Internet2	22. Block 4 Worksheet No.: 445743
23a. Monthly Charges: \$4,550.00	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$4,550.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$54,600.00	
23f. Annual non-recurring (one-time) charges: \$0.00	23g. Ineligible non-recurring amt.: \$0.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$54,600.00	
23j. % discount (from Block 4): 73	
23k. Funding Commitment Request (23i x 23j): \$39,858.00	

Block 6: Certifications and Signature

24a. Schools: Y
 24b. Libraries or Library Consortia: N
 26a. Individual Technology Plan: Y
 26b. Higher-Level Technology Plan(s): N
 26c. No Technology Plan Needed:
 27a. Approved Technology Plan(s): Y
 27b. State Approved Technology Plan: N
 27c. No Technology Plan Needed:
 36. Printed Name of Authorized Person: Ken Chinavare
 37. Title or Position of Authorized Person: Technology Coordinator
 38. Telephone Number of Authorized Person: (989) 386-3851 ext.

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Applicant's Form Identifier:
Contact Person: Ken Chinavare

Entity Number: 131099
Phone Number: (989) 386-3851

Block 6: Certifications and Signature

471 Application Number: 350454

24. The entities listed in Block 4 of this application are eligible for support because they are: (check one or both)

- a. ☐ schools under the statutory definitions of elementary and secondary schools found in the **No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38)**, that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to) elementary and secondary schools, colleges and universities

25. The eligible schools and libraries listed in Block 4 of this application have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.

26. All of the schools and libraries or library consortia listed in Block 4 of this application are covered by:

- a. ☐ an individual technology plan for using the services requested in this application; and/or
- b. ☐ higher-level technology plan(s) for using the services requested in this application; or
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33. I certify that I am authorized to submit this request on behalf of the above-named institution, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

34. Signature of authorized person **Cert ID = 21480**

35. Date **1/27/2003**

36. Printed name of authorized person **Ken Chinavare**

37. Title or position of authorized person **Technology Coordinator**

38. Telephone number of authorized person (989) **386-3851**

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Please Check to affirm your compliance ☒

471 Application Number: 350454

CLARE-GLADWIN RESD

4041 E MANNSIDING RD

CLARE, MI 48617 -9753

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If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

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**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1: Billed Entity Information

Applicant's Form Identifier: Internet

471 Application Number: 369768 **Funding Year:** 07/01/2003 - 06/30/2004 **Billed Entity Number:** 131099

Name: CLARE-GLADWIN RESD

Address: 4041 E MANNSIDING RD

City: CLARE **State:** MI **Zip:** 48617 9753

Phone: 989-386-3851 **Ext:**

Fax: 989-386-3238

E-mail: kchinavare@cgresd.net

Contact Name: Ken Chinavare

Address: 4041 E MANNSIDING RD

City: CLARE **State:** MI **Zip:** 48617 9753

Contact Phone: 989-386-3851 **Ext:**

Contact Fax: 989-386-3238 **Ext:**

E-mail: kchinavare@cgresd.net

Contact Mode: EMAIL

Alternate Contact Info.: Doug Dodge, Superintendent (989-386-3851) ddodge@cgresd.net

Type of Application: CONSORTIUM

Ineligible Orgs: N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 12000

Number of library patrons to be served:

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
f. Direct connections to the Internet: How many before and after your order?	1	6
g. Direct connections to the Internet: Highest speed before and after your order?	4.5mb	9
h. Internet access(for schools): How many rooms have Internet access before and after your order?	600	650
j. Internet Access: How many computers (or other devices) with Internet access before and after your order?	1500	2000

Block 4: Worksheets

Worksheet C No: 481122

Entity Count: 6

Sum. Discount (Sum. Column 3): 436%

Shared Discount: 73%

1. School District Name: BEAVERTON RURAL SCHOOL DIST

2. Entity Number: 131092

Prep. Worksheet No: [481123](#)

3. Discount: 66%

1. School District Name: CLARE PUBLIC SCHOOL DISTRICT

2. Entity Number: 131097

Prep. Worksheet No: [481125](#)

3. Discount: 66%

1. School District Name: CLARE-GLADWIN RESD

2. Entity Number: 131099

Prep. Worksheet No: [481126](#)

3. Discount: 80%

1. School District Name: FARWELL AREA SCHOOL DISTRICT

2. Entity Number: 131103

Prep. Worksheet No: [481127](#)

3. Discount: 77%

1. School District Name: GLADWIN COMMUNITY SCHOOLS

2. Entity Number: 131106

Prep. Worksheet No: [481128](#)

3. Discount: 67%

1. School District Name: HARRISON COMM SCHOOL DISTRICT

2. Entity Number: 131109

Prep. Worksheet No: [481130](#)

3. Discount: 80%

Prep. Worksheet A No: 481123 Student Count: 1739

School District Name: BEAVERTON RURAL SCHOOL DIST

Entity Number: 131092

Weighted Product (Sum. Column 8): 1156.4

Shared Discount: 66%

1. School Name: BEAVERTON ELEMENTARY SCHOOL

2. Entity Number: 56114 3. Rural/Urban: Rural

4. Student Count: 339 5. NSLP Students: 151 6. NSLP Students/Students: 44.542%

7. Discount: 70% 8. Weighted Product: 237.3

1. School Name: BEAVERTON JR HIGH SCHOOL

2. Entity Number: 56115 3. Rural/Urban: Rural

4. Student Count: 257 5. NSLP Students: 112 6. NSLP Students/Students: 43.579%

7. Discount: 70% 8. Weighted Product: 179.9

1. School Name: BEAVERTON MIDDLE SCHOOL

2. Entity Number: 56116 3. Rural/Urban: Rural

4. Student Count: 534 5. NSLP Students: 225 6. NSLP Students/Students: 42.134%

7. Discount: 70% 8. Weighted Product: 373.8

1. School Name: BEAVERTON SR HIGH SCHOOL

2. Entity Number: 56117 3. Rural/Urban: Rural

4. Student Count: 609 5. NSLP Students: 192 6. NSLP Students/Students: 31.527%

7. Discount: 60% 8. Weighted Product: 365.4

Prep. Worksheet A No: 481125 Student Count: 1744

School District Name: CLARE PUBLIC SCHOOL DISTRICT

Entity Number: 131097

Weighted Product (Sum. Column 8): 1155.7**Shared Discount: 66%**

1. **School Name:** CLARE MIDDLE SCHOOL
 2. **Entity Number:** 56131 3. **Rural/Urban:** Rural
 4. **Student Count:** 531 5. **NSLP Students:** 207 6. **NSLP Students/Students:** 38.983%
 7. **Discount:** 70% 8. **Weighted Product:** 371.7

1. **School Name:** CLARE PRIMARY SCHOOL
 2. **Entity Number:** 56130 3. **Rural/Urban:** Rural
 4. **Student Count:** 562 5. **NSLP Students:** 244 6. **NSLP Students/Students:** 43.416%
 7. **Discount:** 70% 8. **Weighted Product:** 393.4

1. **School Name:** CLARE SR HIGH SCHOOL
 2. **Entity Number:** 56129 3. **Rural/Urban:** Rural
 4. **Student Count:** 651 5. **NSLP Students:** 191 6. **NSLP Students/Students:** 29.339%
 7. **Discount:** 60% 8. **Weighted Product:** 390.6

Prep. Worksheet A No: 481126 **Student Count:** 89**School District Name:** CLARE-GLADWIN RESD**Entity Number:** 131099**Weighted Product (Sum. Column 8): 71.2****Shared Discount: N/A**

1. **School Name:** CLARE GLADWIN DAY SCHOOL
 2. **Entity Number:** 56133 3. **Rural/Urban:** Rural
 4. **Student Count:** 89 5. **NSLP Students:** 61 6. **NSLP Students/Students:** 68.539%
 7. **Discount:** 80% 8. **Weighted Product:** 71.2

Prep. Worksheet A No: 481127 **Student Count:** 1667**School District Name:** FARWELL AREA SCHOOL DISTRICT**Entity Number:** 131103**Weighted Product (Sum. Column 8): 1277.8****Shared Discount: 77%**

1. **School Name:** FARWELL ELEMENTARY SCHOOL
 2. **Entity Number:** 56139 3. **Rural/Urban:** Rural
 4. **Student Count:** 599 5. **NSLP Students:** 388 6. **NSLP Students/Students:** 64.774%
 7. **Discount:** 80% 8. **Weighted Product:** 479.2

1. **School Name:** FARWELL MIDDLE SCHOOL
 2. **Entity Number:** 56140 3. **Rural/Urban:** Rural
 4. **Student Count:** 510 5. **NSLP Students:** 319 6. **NSLP Students/Students:** 62.549%
 7. **Discount:** 80% 8. **Weighted Product:** 408

1. **School Name:** FARWELL SR HIGH SCHOOL
 2. **Entity Number:** 56141 3. **Rural/Urban:** Rural
 4. **Student Count:** 558 5. **NSLP Students:** 244 6. **NSLP Students/Students:** 43.727%
 7. **Discount:** 70% 8. **Weighted Product:** 390.6

Prep. Worksheet A No: 481128 **Student Count:** 1988**School District Name:** GLADWIN COMMUNITY SCHOOLS**Entity Number:** 131106**Weighted Product (Sum. Column 8): 1332.3****Shared Discount: 67%**

1. **School Name:** GLADWIN COMMUNITY ALT HIGH SCH
 2. **Entity Number:** 183371 3. **Rural/Urban:** Rural
 4. **Student Count:** 24 5. **NSLP Students:** 22 6. **NSLP Students/Students:** 91.666%
 7. **Discount:** 90% 8. **Weighted Product:** 21.6

1. **School Name:** GLADWIN ELEMENTARY SCHOOL
 2. **Entity Number:** 56147 3. **Rural/Urban:** Rural
 4. **Student Count:** 371 5. **NSLP Students:** 169 6. **NSLP Students/Students:** 45.552%
 7. **Discount:** 70% 8. **Weighted Product:** 259.7

1. **School Name:** GLADWIN INTERMEDIATE SCHOOL
 2. **Entity Number:** 56145 3. **Rural/Urban:** Rural
 4. **Student Count:** 432 5. **NSLP Students:** 191 6. **NSLP Students/Students:** 44.212%
 7. **Discount:** 70% 8. **Weighted Product:** 302.4

1. **School Name:** GLADWIN JR HIGH SCHOOL
 2. **Entity Number:** 56148 3. **Rural/Urban:** Rural
 4. **Student Count:** 520 5. **NSLP Students:** 237 6. **NSLP Students/Students:** 45.576%
 7. **Discount:** 70% 8. **Weighted Product:** 364

1. **School Name:** GLADWIN SR HIGH SCHOOL
 2. **Entity Number:** 56146 3. **Rural/Urban:** Rural
 4. **Student Count:** 641 5. **NSLP Students:** 160 6. **NSLP Students/Students:** 24.961%
 7. **Discount:** 60% 8. **Weighted Product:** 384.6

Prep. Worksheet A No: 481130 **Student Count:** 2127
School District Name: HARRISON COMM SCHOOL DISTRICT
Entity Number: 131109
Weighted Product (Sum. Column 8): 1692.3 **Shared Discount:** 80%

1. **School Name:** AMBLE ELEMENTARY SCHOOL
 2. **Entity Number:** 56156 3. **Rural/Urban:** Rural
 4. **Student Count:** 138 5. **NSLP Students:** 110 6. **NSLP Students/Students:** 79.710%
 7. **Discount:** 90% 8. **Weighted Product:** 124.2

1. **School Name:** HARRISON ALTERNATIVE EDUCATION
 2. **Entity Number:** 202018 3. **Rural/Urban:** Rural
 4. **Student Count:** 39 5. **NSLP Students:** 19 6. **NSLP Students/Students:** 48.717%
 7. **Discount:** 70% 8. **Weighted Product:** 27.3

1. **School Name:** HARRISON HIGH SCHOOL
 2. **Entity Number:** 56152 3. **Rural/Urban:** Rural
 4. **Student Count:** 650 5. **NSLP Students:** 249 6. **NSLP Students/Students:** 38.307%
 7. **Discount:** 70% 8. **Weighted Product:** 455

1. **School Name:** HARRISON MIDDLE SCHOOL
 2. **Entity Number:** 56153 3. **Rural/Urban:** Rural
 4. **Student Count:** 543 5. **NSLP Students:** 328 6. **NSLP Students/Students:** 60.405%
 7. **Discount:** 80% 8. **Weighted Product:** 434.4

1. **School Name:** HILLSIDE ELEMENTARY SCHOOL
 2. **Entity Number:** 56155 3. **Rural/Urban:** Rural

4. Student Count: 458 5. NSLP Students: 348 6. NSLP Students/Students: 75.982%
 7. Discount: 90% 8. Weighted Product: 412.2

1. School Name: LARSON ELEMENTARY SCHOOL
 2. Entity Number: 56154 3. Rural/Urban: Rural
 4. Student Count: 299 5. NSLP Students: 151 6. NSLP Students/Students: 50.501%
 7. Discount: 80% 8. Weighted Product: 239.2

Block 5: Discount Funding Request(s)

FRN: 1008157 FCDL Date:	
11. Category of Service: Internet Access	12. 470 Application Number: 635920000418193
13. SPIN: 143004346	14. Service Provider Name: Crystal Automation Systems, Inc.
15. Contract Number: CAS-Q2163	16. Billing Account Number: N/A
17. Allowable Contract Date: 11/04/2002	18. Contract Award Date: 12/28/2002
19a. Service Start Date: 07/01/2003	19b. Service End Date:
20. Contract Expiration Date: 06/30/2004	
21. Attachment #: Internet	22. Block 4 Worksheet No.: 481122
23a. Monthly Charges: \$52,322.08	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$52,322.08	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$627,864.96	
23f. Annual non-recurring (one-time) charges: \$35.00	23g. Ineligible non-recurring amt.: \$.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$35.00	
23i. Total program year pre-discount amount (23e + 23h): \$627,899.96	
23j. % discount (from Block 4): 73	
23k. Funding Commitment Request (23i x 23j): \$458,366.97	

Block 6: Certifications and Signature

24a. Schools: Y
 24b. Libraries or Library Consortia: N
 26a. Individual Technology Plan: Y
 26b. Higher-Level Technology Plan(s): N
 26c. No Technology Plan Needed:
 27a. Approved Technology Plan(s): Y
 27b. State Approved Technology Plan: N
 27c. No Technology Plan Needed:
 36. Printed Name of Authorized Person: Ken Chinavare

37. Title or Position of Authorized Person: Technology Coordinator

38. Telephone Number of Authorized Person: (989) 386-3851 ext.

UNIVERSAL SERVICE

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FCC Form 471
Services Ordered and Certification Form



Applicant's Form Identifier:
Contact Person: Ken Chinavare

Entity Number: 131099
Phone Number: (989) 386-3851

Block 6: Certifications and Signature

Do not write in this area

471 Application Number: 369768

- 24. The entities listed in Block 4 of this application are eligible for support because they are: (check one or both)**
- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
 - b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to) elementary and secondary schools, colleges and universities

25. The eligible schools and libraries listed in Block 4 of this application have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.

26. All of the schools and libraries or library consortia listed in Block 4 of this application are covered by:

- a. ☒ an individual technology plan for using the services requested in this application; and/or
- b. ☐ higher-level technology plan(s) for using the services requested in this application; or
- c. ☐ no technology plan needed; applying for basic local distance telephone service only.

27. Status of technology plans (If representing multiple entities with mixed technology plan status, check both a and b):

- a. ☒ technology plan(s) has/have been approved; and/or
- b. ☐ technology plan(s) will be approved by a state or other authorized body; or
- c. ☐ no technology plan needed; applying for basic local and long distance telephone service only.

28. I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurements of services for which support is being sought.

29. I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

30. I certify that the entity(ies) I represent has complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.

31. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service receive an appropriate share of benefits from those services.

32. I recognize that I may be audited pursuant to this application. I will retain for five years any and all worksheets and other records that I rely upon to fill out this application, and, if audited, will make available to the Administrator such records.

33. I certify that I am authorized to submit this request on behalf of the above-named institution, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

34. Signature of authorized person Cert ID = 24069

35. Date 2/3/2003

36. Printed name of authorized person **Ken Chinavare**

37. Title or position of authorized person **Technology Coordinator**

38. Telephone number of authorized person **(989) 386-3851**

ATTENTION: If you are signing Form 471 using the PIN assigned to you by SLD, you are reminded that using the PIN is equivalent to your handwritten signature on the form. Your use of the PIN to affirm these certifications means that should they prove untrue, you will be held to the same enforcement standards as those who affirm the certifications on paper. Also, by using the PIN, you are affirming that you have the authority to make these certifications and represent the entity featured in Block One of this funding request.

Please Check to affirm your compliance ☒

471 Application Number: 369768

CLARE-GLADWIN RESD

4041 E MANNSIDING RD

CLARE, MI 48617 -9753

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001. The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator, 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public.

If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 46 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington DC 20554.

Please retain a copy of this page and submit a copy with any communications to the SLD. Please enclose a copy of this confirmation page when mailing your item 21 attachments.

[Return to SLD Home Page](#)

EXHIBIT H

Michigan Department of Consumer and Industry Services

Filing Endorsement

This is to Certify that the ARTICLES OF INCORPORATION - PROFIT

for

ELITE FUND, INC.

ID NUMBER: 05846D

***received by facsimile transmission on September 17, 2003 is hereby endorsed filed on
September 19, 2003 by the Administrator. The document is effective on the date filed,
unless a subsequent effective date within 90 days after received date is stated in the
document.***



Sent by Facsimile Transmission 03282

***In testimony whereof, I have hereunto set my
hand and affixed the Seal of the Department,
in the City of Lansing, this 19th day
of September, 2003.***

, Director

Bureau of Commercial Services

EXHIBIT I

470

Schools and Libraries Universal Service Description of Services Requested and Certification Form

Estimated Average Burden Hours Per Response: 4.0 hours

This form is designed to help you describe the eligible telecommunications-related services you seek so that this data can be posted on the Fund Administrator website and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before beginning this application.

(To be completed by entity that will negotiate with providers.)

Block 1: Applicant Address and Identifications

Form 470 Application Number: 648900000481004

Applicant's Form Identifier: Tel/Int/IC

Application Status: CERTIFIED

Posting Date: 12/11/2003

Allowable Contract Date: 01/08/2004

Certification Received Date: 12/11/2003

1. Name of Applicant:

CLARE-GLADWIN RESD

2. Funding Year:

07/01/2004 - 06/30/2005

3. Your Entity Number

131099

4a. Applicant's Street Address, P.O.Box, or Route Number

4041 E MANNSIDING RD

City

CLARE

State

MI

Zip Code

48617 - 9753

b. Telephone number

ext.

(517) 386- 3851

c. Fax number

() -

d. E-mail Address

5. Type Of Applicant



Individual School (individual public or non-public school)



School District (LEA;public or non-public[e.g., diocesan] local district representing multiple schools)



Library (including library system, library branch, or library consortium applying as a library)



Consortium (intermediate service agencies, states, state networks, special consortia)

6a. Contact Person's Name: Ken Chinavare

First, fill in every item of the Contact Person's information below that is different from Item 4, above. Then check the box next to the preferred mode of contact. (At least one box **MUST** be checked.)

6b. Street Address, P.O.Box, or Route Number

4041 E. Mannsiding Rd.

City

Clare

State

MI

Zip Code

48617



6c. Telephone Number (989) 386- 3851



6d. Fax Number (989) 386- 3238



6e. E-mail Address kchinavare@cgresd.net

Block 2: Summary Description of Needs or Services Requested

7 This Form 470 describes (check all that apply):

- a. ☒ Tariffed services - telecommunications services, purchased at regulated prices, for which the applicant has no signed, written contract. A new Form 470 must be filed for tariffed services for each funding year.
- b. ☐ Month-to-month services for which the applicant has no signed, written contract. A new Form 470 must be filed for these services for each funding year.
- c. ☒ Services for which a new written contract is sought for the funding year in Item 2.
- d. ☐ A multi-year contract signed on or before 7/10/97 but for which no Form 470 has been filed in a previous program year.

NOTE: Services that are covered by a signed, written contract executed pursuant to posting of a Form 470 in a previous program year OR a contract signed on/before 7/10/97 and reported on a Form 470 in a previous year as an existing contract do NOT require filing of a Form 470.

What kinds of service are you seeking: Telecommunications Services, Internet Access, or Internal Connections? Refer to the Eligible Services List at www.sl.universalservice.org for examples. Check the relevant category or categories (8, 9, and/or 10 below), and answer the questions in each category you select.

8 ☒ Telecommunications Services

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a ☒ YES, I have an RFP. It is available on the Web at www.elitefund.com/usf/cgresd.net or via (check one):
☐ the Contact Person in Item 6 or ☐ the contact listed in Item 11.

- b ☐ NO , I do not have an RFP for these services.

If you answered NO, you must list below the Telecommunications Services you seek. Specify each service or function (e.g., local voice service) and quantity and/or capacity(e.g., 20 existing lines plus 10 new ones). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Telecommunications Services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism. Add additional lines if needed.

9 ☒ Internet Access

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a ☒ YES, I have an RFP. It is available on the Web at www.elitefund.com/usf/cgresd.net or via (check one):
☐ the Contact Person in Item 6 or ☐ the contact listed in Item 11.

- b ☐ NO , I do not have an RFP for these services.

If you answered NO, you must list below the Internet Access Services you seek. Specify each service or function (e.g., monthly Internet service) and quantity and/or capacity(e.g., for 500 users). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internet Access services. Add additional lines if needed.

10 ☒ Internal Connections

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a ☒ YES, I have an RFP. It is available on the Web at www.elitefund.com/usf/cgresd.htm or via (check one):
☐ the Contact Person in Item 6 or ☐ the contact listed in Item 11.

- b ☐ NO , I do not have an RFP for these services.

If you answered NO, you must list below the Internal Connections Services you seek. Specify each service or function (e.g., local area network) and quantity and/or capacity(e.g., connecting 10 rooms and 300 computers at 56kbps or better). See the Eligible Services List at www.sl.universalservice.org for

examples of eligible Internal Connections services. Add additional lines if needed.

11 (Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This need not be the contact person listed in Item 6 nor the signer of this form.

Name: _____ Title: _____

Telephone number

() - _____

Fax number

() - _____

E-mail Address _____

12. ☐ Check here if there are any restrictions imposed by state or local laws or regulations on how or when providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures, and/or provide Web address where they are posted and a contact name and telephone number for service providers without Internet access.

13. If you intend to enter into a multi-year contract based on this posting or a contract featuring an option for voluntary extensions you may provide that information below. If you have plans to purchase additional services in future years, or expect to seek new contracts for existing services, summarize below (including the likely timeframes).

Block 3: Technology Assessment

14. ☐ **Basic telephone service only:** If your application is for basic local and long distance telephone service (wireline or wireless) only, check this box and skip to Item 16.

15. Although the following services and facilities are ineligible for support, they are usually necessary to make effective use of the eligible services requested in this application. Unless you indicated in Item 14 that your application is ONLY for basic telephone service, you must check at least one box in (a) through (e). You may provide details for purchases being sought.

a. Desktop communications software: Software required ☒ has been purchased; and/or ☐ is being sought.

b. Electrical systems: ☒ adequate electrical capacity is in place or has already been arranged; and/or ☐ upgrading for additional electrical capacity is being sought.

c. Computers: a sufficient quantity of computers ☒ has been purchased; and/or ☐ is being sought.

d. Computer hardware maintenance: adequate arrangements ☒ have been made; and/or ☐ are being sought.

e. Staff development: ☒ all staff have had an appropriate level of training /additional training has already been scheduled; and/or ☐ training is being sought.

f. Additional details: Use this space to provide additional details to help providers to identify the services you desire.

Block 4: Recipients of Service

16. Eligible Entities That Will Receive Services:

Check the ONE choice (a,b or c) that best describes this application and the eligible entities that will receive the services described in this

application. You will then list in Item 17 the entity/entities that will pay the bills for these services.

a. ☒ Individual school or single-site library.

b. ☒ Statewide application for (enter 2-letter state code) representing (check all that apply):

- ☒ All public schools/districts in the state:
☐ All non-public schools in the state:
☐ All libraries in the state:

If your statewide application includes INELIGIBLE entities, check here. ☐ If checked, complete Item 18.

c. ☒ School district, library system, or consortium application to serve multiple eligible entities:

Number of eligible entities	32
<i>For these eligible sites, please provide the following</i>	
Area Codes (list each unique area code)	Prefixes associated with each area code (first 3 digits of phone number) separate with commas, leave no spaces
989	246
989	386
989	426
989	435
989	539
989	588
If your application includes INELIGIBLE entities, check here. <input type="checkbox"/> If checked, complete Item 18.	

17. Billed Entities

List the entity/entities that will be paying the bills directly to the provider for the services requested in this application. These are known as Billed Entities. At least one line of this item must be completed. Attach additional sheets if necessary.

Entity Number	Entity
131099	CLARE-GLADWIN RESD

18. Ineligible Participating Entities

Does your application also seek bids on services to entities that are not eligible for the Universal Service Program? If so, list those entities here (attach pages if needed):

Ineligible Participating Entity	Area Code	Prefix
--	------------------	---------------

Block 5: Certification

19. The applicant includes:(Check one or both)

- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☒ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to elementary and secondary schools, colleges and universities).

20. All of the individual schools, libraries, and library consortia receiving services under this application are covered by:

- a. ☒ individual technology plans for using the services requested in the application, and/or
- b. ☒ higher-level technology plans for using the services requested in the application, or
- c. ☒ no technology plan needed; application requests basic local and/or long distance telephone service only.

21. Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):

- a. ☒ technology plan(s) has/have been approved by a state or other authorized body.
- b. ☒ technology plan(s) will be approved by a state or other authorized body.
- c. ☒ no technology plan needed; application requests basic local and long distance telephone service only. .

22. ☒ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

23. ☒ I recognize that support under this support mechanism is conditional upon the school(s) or library(ies) I represent securing access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to use the services purchased effectively.

24. ☒ I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

25. Signature of authorized person: ☒

26. Date (mm/dd/yyyy): **12/11/2003**

27. Printed name of authorized person: **Ken Chinavare**

28. Title or position of authorized person: **Technology Coordinator**

29a. Address of authorized person: 4041 E. Mannsiding Rd.

City: Clare State: MI Zip: 48617

29b. Telephone number of authorized person: (989) 386 - 3851

29c. Fax number of authorized person: (989) 3863238

29d. E-mail address number of authorized person: kchinavare@cgresd.net

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

Service provider involvement with preparation or certification of a Form 470 can taint the competitive bidding process and result in the denial of funding requests. For more information, refer to the "Service Provider Role in Assisting Customers" at www.sl.universalservice.org/vendor/manual/chapter5.doc or call the Client Service Bureau at 1-888-203-8100.

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Please submit this form to:

**SLD-Form 470
P.O. Box 7026
Lawrence, Kansas 66044-7026
1-888-203-8100**

For express delivery services or U.S. Postal Service, Return Receipt Requested, mail this form to:

SLD-Form 470
c/o Ms. Smith
3833 Greenway Drive
Lawrence, Kansas 66046
1-888-203-8100

FCC Form 470
April 2002

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Schools and Libraries Universal Service Program Services Ordered and Certification Form 471 Application Display

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Block 1: Billed Entity Information

Applicant's Form Identifier: Internet

471 Application Number: 420735

Cert. Postmark Date:

Out of Window Letter Date:

Funding Year: 07/01/2004 - 06/30/2005

Form Status: INCOMPLETE

Billed Entity Number: 131099

RAL Date:

Name: CLARE-GLADWIN RESD

Address: 4041 E MANNSIDING RD

City: CLARE **State:** MI **Zip:** 48617 9753

Phone: 517-386-3851 **Ext:**

Fax: --

E-mail:

Contact Name: Ken Chinavare

Address: 4041 E MANNSIDING RD

City: CLARE **State:** MI **Zip:** 48617 9753

Contact Phone: 989-386-3851 **Ext:**

Contact Fax: 989-386-3238 **Ext:**

E-mail: kchinavare@cgresd.net

Contact Mode: EMAIL

Alternate Contact Info.: Doug Dodge, Superintendent (989-386-3851)

Type of Application: CONSORTIUM

Ineligible Orgs: N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 12000

Number of library patrons to be served:

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
f. Direct connections to the Internet: How many before and after your order?	1	1
g. Direct connections to the Internet: Highest speed before and after your order?	45mb	45mb
h. Internet access(for schools): How many rooms have Internet access before and after your order?	625	650
i. Internet Access: How many computers (or other devices) with Internet access before and after your order?	1700	2000

Block 4: Worksheets

Worksheet C No: 589517

Entity Count: 6

Sum. Discount (Sum. Column 3): 432%

Shared Discount: 72%

1. School District Name: BEAVERTON RURAL SCHOOL DIST

2. Entity Number: 131092

Prep. Worksheet No: [589518](#)

3. Discount: 69%

1. School District Name: CLARE PUBLIC SCHOOL DISTRICT

2. Entity Number: 131097

Prep. Worksheet No: [589519](#)

3. Discount: 63%

1. School District Name: CLARE-GLADWIN RESD

2. Entity Number: 131099

Prep. Worksheet No: [589520](#)

3. Discount: 80%

1. School District Name: FARWELL AREA SCHOOL DISTRICT

2. Entity Number: 131103

Prep. Worksheet No: [589521](#)

3. Discount: 77%

1. School District Name: GLADWIN COMMUNITY SCHOOLS

2. Entity Number: 131106

Prep. Worksheet No: [589522](#)

3. Discount: 65%

1. School District Name: HARRISON COMM SCHOOL DISTRICT

2. Entity Number: 131109

Prep. Worksheet No: [589523](#)

3. Discount: 78%

Prep. Worksheet A No: 589518 Student Count: 1829

School District Name: BEAVERTON RURAL SCHOOL DIST

Entity Number: 131092

Weighted Product (Sum. Column 8): 1257.6

Shared Discount: 69%

1. School Name: BEAVERTON ELEMENTARY SCHOOL

2. Entity Number: 56114 3. Rural/Urban: Rural

4. Student Count: 254

5. NSLP Students: 111

6. NSLP Students/Students: 43.700%

7. Discount: 70%

8. Weighted Product: 177.8

1. School Name: BEAVERTON JR HIGH SCHOOL

2. Entity Number: 56115 3. Rural/Urban: Rural

4. Student Count: 382

5. NSLP Students: 190

6. NSLP Students/Students: 49.738%

7. Discount: 80%

8. Weighted Product: 305.6

1. School Name: BEAVERTON MIDDLE SCHOOL

2. Entity Number: 56116 3. Rural/Urban: Rural

4. Student Count: 584

5. NSLP Students: 252

6. NSLP Students/Students: 43.150%

7. Discount: 70%

8. Weighted Product: 408.8

1. School Name: BEAVERTON SR HIGH SCHOOL

2. Entity Number: 56117 3. Rural/Urban: Rural

4. Student Count: 609

5. NSLP Students: 192

6. NSLP Students/Students: 31.527%

7. Discount: 60%

8. Weighted Product: 365.4

Prep. Worksheet A No: 589519 **Student Count:** 1657

School District Name: CLARE PUBLIC SCHOOL DISTRICT

Entity Number: 131097

Weighted Product (Sum. Column 8): 1049.8

Shared Discount: 63%

1. School Name: CLARE MIDDLE SCHOOL

2. Entity Number: 56131 **3. Rural/Urban:** Rural

4. Student Count: 504 **5. NSLP Students:** 168 **6. NSLP Students/Students:** 33.333%

7. Discount: 60% **8. Weighted Product:** 302.4

1. School Name: CLARE PRIMARY SCHOOL

2. Entity Number: 56130 **3. Rural/Urban:** Rural

4. Student Count: 556 **5. NSLP Students:** 224 **6. NSLP Students/Students:** 40.287%

7. Discount: 70% **8. Weighted Product:** 389.2

1. School Name: CLARE SR HIGH SCHOOL

2. Entity Number: 56129 **3. Rural/Urban:** Rural

4. Student Count: 597 **5. NSLP Students:** 182 **6. NSLP Students/Students:** 30.485%

7. Discount: 60% **8. Weighted Product:** 358.2

Prep. Worksheet A No: 589520 **Student Count:** 89

School District Name: CLARE-GLADWIN RESD

Entity Number: 131099

Weighted Product (Sum. Column 8): 71.2

Shared Discount: 80%

1. School Name: CLARE GLADWIN DAY SCHOOL

2. Entity Number: 56133 **3. Rural/Urban:** Rural

4. Student Count: 89 **5. NSLP Students:** 64 **6. NSLP Students/Students:** 71.910%

7. Discount: 80% **8. Weighted Product:** 71.2

1. School Name: CLARE-GLADWIN RESD ADMIN BUILDING

2. Entity Number: 16024119 **3. Rural/Urban:** Rural

4. Student Count: 0 **5. NSLP Students:** 0 **6. NSLP Students/Students:**

7. Discount: 80% **8. Weighted Product:** 0

Prep. Worksheet A No: 589521 **Student Count:** 1674

School District Name: FARWELL AREA SCHOOL DISTRICT

Entity Number: 131103

Weighted Product (Sum. Column 8): 1283

Shared Discount: 77%

1. School Name: FARWELL ELEMENTARY SCHOOL

2. Entity Number: 56139 **3. Rural/Urban:** Rural

4. Student Count: 590 **5. NSLP Students:** 356 **6. NSLP Students/Students:** 60.338%

7. Discount: 80% **8. Weighted Product:** 472

1. School Name: FARWELL MIDDLE SCHOOL

2. Entity Number: 56140 **3. Rural/Urban:** Rural

4. Student Count: 522 **5. NSLP Students:** 297 **6. NSLP Students/Students:** 56.896%

7. Discount: 80% **8. Weighted Product:** 417.6

1. School Name: FARWELL SR HIGH SCHOOL

2. Entity Number: 56141 **3. Rural/Urban:** Rural

4. Student Count: 562 5. NSLP Students: 228 6. NSLP Students/Students: 40.569%
 7. Discount: 70% 8. Weighted Product: 393.4

Prep. Worksheet A No: 589522 Student Count: 1989
 School District Name: GLADWIN COMMUNITY SCHOOLS
 Entity Number: 131106

Weighted Product (Sum. Column 8): 1286.3

Shared Discount: 65%

1. School Name: GLADWIN COMMUNITY ALT HIGH SCH

2. Entity Number:
183371

3. Rural/Urban: Rural

4. Student Count: 51 5. NSLP Students: 38 6. NSLP Students/Students: 74.509%
 7. Discount: 90% 8. Weighted Product: 45.9

1. School Name: GLADWIN ELEMENTARY SCHOOL

2. Entity Number: 56147 3. Rural/Urban: Rural

4. Student Count: 326 5. NSLP Students: 132 6. NSLP Students/Students: 40.490%
 7. Discount: 70% 8. Weighted Product: 228.2

1. School Name: GLADWIN INTERMEDIATE SCHOOL

2. Entity Number: 56145 3. Rural/Urban: Rural

4. Student Count: 450 5. NSLP Students: 206 6. NSLP Students/Students: 45.777%
 7. Discount: 70% 8. Weighted Product: 315

1. School Name: GLADWIN JR HIGH SCHOOL

2. Entity Number: 56148 3. Rural/Urban: Rural

4. Student Count: 546 5. NSLP Students: 187 6. NSLP Students/Students: 34.249%
 7. Discount: 60% 8. Weighted Product: 327.6

1. School Name: GLADWIN SR HIGH SCHOOL

2. Entity Number: 56146 3. Rural/Urban: Rural

4. Student Count: 616 5. NSLP Students: 137 6. NSLP Students/Students: 22.240%
 7. Discount: 60% 8. Weighted Product: 369.6

Prep. Worksheet A No: 589523 Student Count: 2218

School District Name: HARRISON COMM SCHOOL DISTRICT

Entity Number: 131109

Weighted Product (Sum. Column 8): 1726.8

Shared Discount: 78%

1. School Name: AMBLE ELEMENTARY SCHOOL

2. Entity Number: 56156 3. Rural/Urban: Rural

4. Student Count: 212 5. NSLP Students: 160 6. NSLP Students/Students: 75.471%
 7. Discount: 90% 8. Weighted Product: 190.8

1. School Name: HARRISON ALTERNATIVE EDUCATION

2. Entity Number:
202018 3. Rural/Urban: Rural

4. Student Count: 40 5. NSLP Students: 15 6. NSLP Students/Students: 37.500%
 7. Discount: 70% 8. Weighted Product: 28

1. School Name: HARRISON HIGH SCHOOL

2. Entity Number: 56152 3. Rural/Urban: Rural

4. Student Count: 648 5. NSLP Students: 242 6. NSLP Students/Students: 37.345%

7. Discount: 70% 8. Weighted Product: 453.6

1. School Name: HARRISON MIDDLE SCHOOL
 2. Entity Number: 56153 3. Rural/Urban: Rural
 4. Student Count: 571 5. NSLP Students: 299 6. NSLP Students/Students: 52.364%
 7. Discount: 80% 8. Weighted Product: 456.8

1. School Name: HILLSIDE ELEMENTARY SCHOOL
 2. Entity Number: 56155 3. Rural/Urban: Rural
 4. Student Count: 460 5. NSLP Students: 339 6. NSLP Students/Students: 73.695%
 7. Discount: 80% 8. Weighted Product: 368

1. School Name: LARSON ELEMENTARY SCHOOL
 2. Entity Number: 56154 3. Rural/Urban: Rural
 4. Student Count: 287 5. NSLP Students: 143 6. NSLP Students/Students: 49.825%
 7. Discount: 80% 8. Weighted Product: 229.6

Block 5: Discount Funding Request(s)

FRN: 1159681 FCDL Date:	
11. Category of Service: Internet Access	12. 470 Application Number: 648900000481004
13. SPIN: 143004346	14. Service Provider Name: Crystal Automation Systems, Inc.
15. Contract Number: N/A	16. Billing Account Number:
17. Allowable Contract Date: 01/08/2004	18. Contract Award Date: 02/02/2004
19a. Service Start Date: 07/01/2004	19b. Service End Date:
20. Contract Expiration Date: 06/30/2005	
21. Attachment #: Internet	22. Block 4 Worksheet No.: 589517
23a. Monthly Charges: \$52,325.00	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$52,325.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$627,900.00	
23f. Annual non-recurring (one-time) charges: \$245.00	23g. Ineligible non-recurring amt.: \$.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$245.00	
23i. Total program year pre-discount amount (23e + 23h): \$628,145.00	
23j. % discount (from Block 4): 72	
23k. Funding Commitment Request (23i x 23j): \$452,264.40	

Block 6: Certifications and Signature

24a. Schools: Y

24b. Libraries or Library Consortia: N

26a. Individual Technology Plan: Y

26b. Higher-Level Technology Plan(s): N

26c. No Technology Plan Needed:

27a. Approved Technology Plan(s): Y

27b. State Approved Technology Plan: N

27c. No Technology Plan Needed:

36. Printed Name of Authorized Person: Ken Chinavare

37. Title or Position of Authorized Person: Director of Technology

38a. Address: 4041 E. Mannsiding Rd.

City: Clare **State:** MI **Zip:** 48617

38b. Telephone Number of Authorized Person: (989) 386-3851 ext.

38c. Fax Number of Authorized Person: (989) 386 - 3238

38d. Email address of Authorized Person: kchinavare@cgresd.net

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FCC Form 471

Services Ordered and Certification Form



Applicant's Form Identifier: Internet

Entity Number: 131099

Contact Person: Ken Chinavare

Phone Number: (989) 386-3851

Block 6: Certifications and Signature

Do not write in this area

471 Application Number: 420735

24. The entities listed in Block 4 of this application are eligible for support because they are:
(check one or both)

- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the **No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38)**, that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school including, but not limited to elementary and secondary schools, colleges and universities

25. The entities listed on this application have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

26. All of the schools and libraries or library consortia listed in Block 4 of this application are covered by:

- a. ☒ an individual technology plan for using the services requested in this application; and/or
- b. ☐ higher-level technology plan(s) for using the services requested in this application; or
- c. ☐ no technology plan needed; applying for basic local and long distance telephone service only.

27. Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):

- a. ☒ technology plan(s) has/have been approved; and/or
- b. ☐ technology plan(s) will be approved by a state or other authorized body; or
- c. ☐ no technology plan needed; applying for basic local and long distance telephone service only.

28. I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurement of services for which support is being sought.

29. I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

30. I certify that the entity(ies) I represent has complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.

31. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service receive an appropriate share of benefits from those services.

32. I recognize that I may be audited pursuant to this application. I will retain for five years any and all worksheets and other records that I rely upon to fill out this application, and, if audited, will make available to the Administrator such records.

33. I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

34. Signature of authorized person **Cert ID = 49409**

35. Date **2/2/2004**

36. Printed name of authorized person **Ken Chinavare**

37. Title or position of authorized person **Director of Technology**

38a. Street Address, P.O Box or Route Number **4041 E. Mannsiding Rd.
Clare, MI 48617**

38b. Telephone number of authorized person: **(989) 386-3851**

38c. Fax number of authorized person: **(989) 386-3238**

38d. E-mail of authorized person: **kchinavare@cgresd.net**

ATTENTION: If you are signing Form 471 using the PIN assigned to you by SLD, you are reminded that using the PIN is equivalent to your handwritten signature on the form. Your use of the PIN to affirm these certifications means that should they prove untrue, you will be held to the same enforcement standards as those who affirm the certifications on paper. Also, by using the PIN, you are affirming that you have the authority to make these certifications and represent the entity featured in Block One of this funding request.

Please Check to affirm your compliance ☒

**471 Application Number: 420735
CLARE-GLADWIN RESD
4041 E MANNSIDING RD
CLARE, MI 48617 -9753**

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The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.

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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of October, 2017, a true and authorized copy of this Request for Review was served by electronic mail upon the following:


Kris Monteith, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, N.W.
Washington, DC 20554
Kris.Monteith@fcc.gov

Letter of Appeal
Schools and Libraries Program –
Correspondence Unit
30 Lanidex Plaza West
P.O. Box 685
Parsippany, NJ 07054-0685
appeals@sl.universalservice.org

Ryan Palmer, Division Chief
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October 23, 2017